



L-7

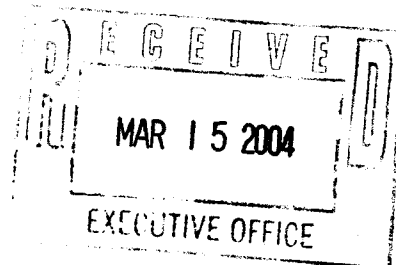
COUNTY SANITATION DISTRICTS OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

JAMES F. STAHL
Chief Engineer and General Manager

March 12, 2004
File No: 31-320.10

Honorable Arthur G. Baggett Jr., Chair
and Members of the Board
State Water Resources Control Board
1001 "I" Street
Sacramento, CA 95814



Dear Chairman Baggett and Members of the Board:

**State Water Resources Control Board (SWRCB) Draft Revised
Statewide Program Environmental Impact Report (PEIR) Covering
General Waste Discharge Requirements for Biosolids Land Application - February 2004**

The County Sanitation Districts of Los Angeles County (CSDLAC) would like to first express its appreciation for the significant amount of time and effort that SWRCB staff have dedicated to the development of the Statewide PEIR Covering General Waste Discharge Requirements for Biosolids Land Application (Modified General Order). The PEIR, along with the Modified General Order, will allow for the continuance of a streamlined regulatory process for land applying biosolids in California. CSDLAC urges your Board to adopt the Modified General Order, as this will allow us to continue managing our diverse beneficial reuse program for biosolids, including Class B biosolids land application, in an efficient and environmentally safe manner.

CSDLAC provides wastewater treatment services for over 5 million people living in 78 cities and unincorporated territory within Los Angeles County. As the largest single generator of biosolids in the State of California, we produce more than 155,000 dry tons per year (430 dry tons per day) of anaerobically digested Class B biosolids. Due to the huge volume of biosolids we manage every day, a diverse biosolids management program containing multiple and independent recycling methods, is crucial in order to provide for reliability and dependability under all possible scenarios. Many volumes of peer-reviewed, university research over several decades have enforced EPA's declaration that land application of both Class A and Class B biosolids under the Part 503 Federal guidelines is completely protective of public health and safety. Even so, CSDLAC is all too aware that any one of our currently practiced recycling methods may be eliminated in a very short period of time, due to public opinion swings and the ongoing negative public perception regarding the recycling of biosolids. Bearing this in mind, multiple recycling opportunities for our biosolids are absolutely essential.

The beneficial reuse of Class B biosolids via direct land application to feed and forage crops has been a cornerstone of CSDLAC's biosolids management program. CSDLAC recycles approximately 20%, or 31,000 dry tons per year, of our biosolids in this manner. Other equally important biosolids management practices we currently employ are composting at two different sites (53%), diversion to two separate privately owned Class A treatment facilities (21%), and cement kiln injection of Class B biosolids for NOx emissions reduction (4%). In order to maintain the viability of landfill disposal as a failsafe management tool, a small portion of CSDLAC's biosolids stream is co-disposed with municipal solid waste (2%) in a CSDLAC-operated landfill. In addition to providing separate and distinct recycling opportunities for our agency and member cities, each of the aforementioned biosolids management options serves a unique market. The balance between these product markets can be destroyed with the removal of any one recycling alternative.

While never forgetting that our most important responsibility is to protect public health and the environment, wastewater treatment plant operators are also stewards of their ratepayers fees. As such, CSDLAC believes that compliance with the stringent Modified General Order requirements not only protects public health and the environment, but also allows for the continued use of a cost-effective means to manage California's biosolids, through the land application of Class B biosolids.

When the process of creating this Modified General Order began, most wastewater treatment plants in California were able to directly land apply Class B biosolids for an overall cost of \$20 - \$30 per wet ton, including transportation. The following brief description is an effort to provide an example of the potential costs associated with development of a Class A processing facility. As a result of the many county ordinances banning the land application of Class B biosolids, CSDLAC recently partnered with another biosolids generator in an effort to construct and operate a state-of-the-art, indoor, biosolids composting facility. The costs associated with this effort are: approximately \$15 million for purchase of land and an existing warehouse; approximately \$4 million for design and construction management; and an estimated \$43 million for construction. Beyond that amount of capital expense, the ongoing operations and maintenance costs are projected to be almost \$26 per wet ton, which will not include transportation. Even at this expense, the capacity of the new facility will be only 37,500 dry tons per year of biosolids, which is on the order of 1% of the biosolids generated in California. If this cost is extrapolated over the amount of biosolids that are currently processed to the Class B level, the overall level of funding is staggering. For CSDLAC, this project will be in addition to our diverse biosolids management program, and it will compliment the other reuse options, such as Class B land application, delivery to other Class A processing facilities, and cement kiln injection for NOx emissions reduction.

While we support the continued land application of Class B biosolids in California, we acknowledge that the management of Class A biosolids is also an environmentally sound management option, albeit with much higher costs and slightly higher impacts than Class B. Thus, we support the availability of both options for biosolids management. We feel the Modified General Order leaves both options available, without placing unnecessary financial burdens on the ratepayers of California.

CSDLAC respectfully submits the following table containing our specific comments on the PEIR text. The comments below are listed in the order in which each section of related text appears in the PEIR. Deletion recommendations are shown with ~~strikeouts~~ and additions are shown with underlines.

No.	Section	Page	Comment
1	Executive Summary	ES-4	Correction should be made in the second paragraph of this page as follows "A hearing was held in July 2001, and a ruling was issued on <u>an</u> August 2003."
2	Executive Summary	ES-5	The changes made in the second paragraph are not consistent with baseline conditions at time of the original Notice of Preparation. Many of the additions and revisions in the revised PEIR describe developments or information that has become available since the original Notice of Preparation. All such items should be documented as such within the text.
3	Executive Summary, Table ES-1	Page 4	For the last impact listed, "Potential for exposure of residents and agricultural workers to unsafe levels of radionuclides after long-term application of biosolids", the "Level of Significance before Mitigation" should be listed as " <u>Potentially</u> Significant." The risk assessment that led to ISCORS management recommendations only identified the 'potential' for exposure, but did not conclusively determine any level of exposure.
4	Executive Summary	ES-19	Correction should be made in the first paragraph of this page as follows "The petition requested that EPA halt the issuance of new NPDES permits and rewrite current NPDES permits that would <u>not</u> allow the land application of biosolids. In addition, the petition requested that the EPA immediately initiate a rulemaking to eliminate land application as an acceptable use of biosolids." The current wording actually describes the opposite of the Center's request.

5	Chapter 1	1-3	Correction should be made in the second paragraph of this page as follows "A hearing was held in July 2001, and a ruling was issued on <u>in</u> August 2003."
6	Chapter 1	1-7	Correction should be made in the second paragraph of this page as follows "In essence, the court opined that the 1999 Biosolids PEIR improperly dismissed these alternatives based of <u>on</u> a comparison <u>on</u> <u>of</u> their effectiveness in reducing environmental impacts to the GO, as mitigated."
7	Chapter 2	2-2	The number stated in the third paragraph for daily biosolids generation in California in 2001 (5,884 dry TPD) appears to be grossly overstated. The number should be checked for consistency with the quoted source, the CASA survey report. Furthermore, this number is not consistent with the total listed in Table 2-2 (1,206,883 dry tons per year = 3,306.5 dry tons per day).
8	Chapter 2, Table 2-2	Page 1	The biosolids quantities listed in dry tons per year for the Los Angeles Region and the Santa Ana Region both appear to be greatly overstated. All values reported in this table should be checked for consistency. Additionally, the total at the bottom of the table is inconsistent with the number listed on Page 2-2.
9	Chapter 2, Table 2-2a	Page 1	The label "Food Crops" needs further explanation. It appears that the types of crops listed were not produced for direct human consumption, but that should be stated more clearly. Possible alternative wording is "Food Chain Crops."
10	Chapter 2	2-5	As previously described, the number stated in the second paragraph for daily biosolids generation in California in 2001 (5,884 dry TPD) appears to be grossly overstated. If this number is incorrect, the 2020 California biosolids generation prediction number, 7,840 dry TPD, should be reduced accordingly.
11	Chapter 2	2-9	The third paragraph lists the number of counties that have implemented biosolids ordinances. The changes made in this paragraph are not consistent with baseline conditions at the time of the original Notice of Preparation. The updated 2004 conditions should be noted as such to provide clarity.
12	Chapter 5	5-4	Row spacing of bullet items is not consistent.
13	Chapter 5	5-9	Correction should be made in the third paragraph of this page as follows "... of incidents, and information sharing <u>amount</u> <u>among</u> agencies, and a halt...."
14	Chapter 5	5-14	Correction should be made in the fourth paragraph of this page as follows "In late 1999, the EPA initiated a rulemaking to consider the regulation of the use and disposal of sewage sludge containing dioxins <u>in biosolids</u> ."
15	Chapter 5	5-16	The second bullet item listing the preliminary conclusions of the ISCORS report should be amended to more accurately describe the "On-site Resident" as one who: grows their food on the land formerly used as an application site; raises animals for their consumption on the land formerly used as an application site; inadvertently ingests small amounts of soil from land formerly used as an application site; draws 90% of their drinking water from wells located under land formerly used as an application site; and so on.
16	Chapter 5	5-24	Correction should be made in the second paragraph of this page as follows "This study reviewed the risk- <u>assessment</u> methods and data used to ..."
17	Chapter 5	5-46	The discussion of the impact "Potential for Exposure of Residents and Agricultural Workers to Unsafe Levels of Radionuclides After Long-Term (50- to 100-year) Application of Biosolids" should be amended to more accurately describe the "Resident", as described in Comment No. 17 of this table.

18	Chapter 5	5-47	Correction should be made in the second paragraph of this page as follows "This impact is considered <u>potentially</u> significant. However, implementation of Mitigation Measure 5-3 <u>5-4</u> will reduce it to a less than significant level." This change is necessary to reflect the ISCORS findings, and to be consistent with the title of this section, " <u>Potential</u> for Exposure of Residents and Agricultural ..."
19	Chapter 6, Table 6-1	Page 1	Correction should be made in the Table as follows "Kings". Also, the description of the Kings County ordinance should read "Class A allowed until 2006. All Biosolids except for Exceptional Quality compost prohibited after 2006 in <u>incorporated and</u> unincorporated areas of the county." Language should also be added that clarifies that the Kings County ordinance was developed after the Notice of Preparation.
20	Chapter 14	14-7	Correction should be made in the third paragraph of this page as follows "Exceptional Quality (EQ) biosolids are biosolids that meet Class A requirements, strict vector attraction <u>reduction</u> requirements, and meet the lowest metals content requirements: of any biosolid (40 CFR 503.13 and 40 CFR 503.32). When a biosolid meets EQ standards, there are no EPA restrictions to use and the application site is not required to be monitored for toxic metals concentration <u>cumulative concentration of metals</u> . EQ biosolids are commonly sold by the bag and marketed for home, rather than commercial <u>or</u> agricultural, use. In contrast, while Class A biosolids have no site restrictions, they are subject to monitoring to avoid the concentration <u>accumulation</u> of toxic <u>regulated heavy</u> metals over time."
21	Chapter 14	14-8	Correction should be made in the fourth paragraph of this page as follows "... of alternative treatment, transportation costs, and landfill fees, and availability ..."
22	Chapter 14	14-9	Correction should be made in the first paragraph of this page as follows "... and Kings County will allow only Exceptional Quality compost <u>beginning in</u> 2006."
23	Chapter 14	14-9	Correction should be made in the fourth paragraph of this page as follows "There are multiple configurations for this process, but they all contain a total of <u>approximately at least</u> fifteen days of detention time in the presence of...."
24	Chapter 14	14-9	In the last paragraph, under the Thermophilic anaerobic digestion, the discussion incorrectly implies that conversion of digesters from mesophilic to thermophilic temperatures will lead to excess methane generation. This is not the case, and can actually lead to a decrease in methane generation, depending on other operational parameters. Conversion to thermophilic digestion does not 'produce' excess energy, it 'requires' excess energy.
25	Chapter 14	14-10	In the fifth paragraph, under the heat drying impacts discussion, it is incorrectly stated that "The amount of additional energy needed beyond current demand will depend in part on the ability to reuse methane gas generated during the digestion process." This is only the case if the methane currently produced in the mesophilic digestion process is not utilized for energy production, which is unlikely given the state of technology at modern wastewater treatment plants.
26	Chapter 14	14-10	Correction should be made in the last paragraph of this page as follows: "... the weight and volume of the biosolids hauled from the treatment plant would be reduced to a quarter of from the "dewatered" biosolids amount." The percent reduction is dependent on both the initial solids content of the dewatered biosolids, which is highly variable, and the method of solids processing utilized.
27	Chapter 14	14-11	Correction should be made in the second paragraph of this page as follows "Chemical addition is a term for any of several commercial processes by which a chemical, <u>usually commonly</u> lime (CaO), is added to biosolids...."

28	Chapter 14	14-11	The use of the word "pasteurize" in the second paragraph is questionable. This term has a specific definition, which does not correspond to chemical addition.
29	Chapter 14	14-11	The fifth sentence in the second paragraph should read: "The biosolids would then be further dried ..." Drying after chemical addition is not common practice.
30	Chapter 14	14-11	The first sentence in the third paragraph, "Chemical addition results in a Class A biosolids that is dry and granular", should be removed. This only occurs if heat drying is utilized after chemical addition, which is not common practice.
31	Chapter 14	14-17	As previously stated, the description of "Food Crops" in the third paragraph is misleading. The crops described are not used for direct human consumption, and some amount of the largest crop listed, wheat, is used for animal feed.
32	Chapter 14	14-18	The first paragraph, which is continued from the previous page, contains an incorrect statement. The increased use of chemical fertilizers does lead to a potential for increases in releases of nitrogen to the environment, but this is not because chemical fertilizers have "greater nitrogen concentration." The reason is that the nitrogen in chemical fertilizers is in a form that is more mobile in water than the organic nitrogen found in biosolids. The following change is suggested " ... release of nitrogen to the environment due to chemical fertilizer's greater nitrogen concentration the more mobile form of nitrogen found in chemical fertilizers, as compared to the organic nitrogen found in biosolids."
33	Chapter 14	14-18	In the last paragraph, under impacts from expansion of the home market, no mention is made of the impacts from the increased energy consumption from composting or other class A conversion technologies. Also, no mention is made of the impact due to increased hauling of biosolids to the Class A conversion sites, or of hauling the finished product to the distribution centers and home improvement stores. These impacts could be substantial.
34	Chapter 14	14-19	CSDLAC recommends an addition to the second paragraph of a cost per ton equivalent value, in addition to the lump sum planning, permitting, construction, operation, and maintenance costs for EBMUD's proposed facility.
35	Chapter 14	14-20	Correction should be made in the second paragraph of this page as follows "For example, only one of the six landfills in Orange County permitted for biosolids disposal actually accepts biosolids and <u>only</u> 4 of the sixteen southern California landfills permitted to accept biosolids have available capacity (Baroldi Pers, Comm; Tetra Tech 2003). Landfill capacity is available in southwestern Arizona but would require a <u>considerably</u> longer truck trip (Tetra Tech. 2003)."
36	Chapter 14	14-20	In the fifth paragraph, under impacts from Landfilling/Alternative Daily Cover Use, the increase in truck traffic, and related increase in particulate and/or ozone precursor emissions, along routes to existing landfills may or may not be significant. The level of significance is dependent on the current air quality conditions of a given air basin, and the impacts should be amended to reflect that. For instance, <u>any</u> increase in those emissions in the jurisdiction of the San Joaquin Valley Air Pollution Control District is considered a significant impact.
37	Chapter 14	14-21	In the second paragraph, under impacts from transport to other states for land application, the increase in truck traffic and related increase in particulate and/or ozone precursor emissions due to increased miles traveled is described as "more severe" and then immediately dismissed as "less-than-significant." The rationale for this conclusion must be explained, because if the miles traveled per haul "approximately doubles", it would seem on the surface that the air quality and traffic impacts would be at least potentially significant.

38	Chapter 14	14-28	The third paragraph states that "imposing grazing restrictions" will reduce the "risk from human ingestion of pathogens on crops." This section appears to suggest that there is some sector of the human population grazing on agricultural lands. Unless this is the case, the paragraph should be reworded.
39	Chapter 14	14-35	In the first paragraph, under Land Productivity, the negative impact of the lower nutrient value of Class A biosolids, as compared to Class B biosolids, should be identified. The impact may or may not be significant, but it should be listed.
40	Chapter 14	14-36	The last paragraph should explain the finding that the "more severe impact" to traffic conditions of "substantially longer truck hauls" is "less than significant."
41	Chapter 14	14-37	In the first paragraph, evidence should be presented to support the finding of a less than significant impact to air quality from increased truck emissions, and the "mitigating features" mentioned in this paragraph should also be described.
42	Chapter 14	14-39	In the paragraph on Public Health, the public exposure to pathogens, and therefore the associated risk to public health, could increase with the Food Crop Limitation Alternative if there is an increase in use of untreated manure on food crops, as a soil amendment replacement for biosolids.
43	Chapter 14	14-39	An impact not identified on the Land Use and Aesthetics discussion is an increase in the amount of fallowed land, due to the lack of an economical source of soil amendments and plant nutrients. This would be a result of both the Class A Only Alternative and the Food Crop Limitation Alternative. These impacts should be identified in all appropriate locations in the document.
44	Chapter 14	14-40	In the first paragraph, under Traffic, it is stated that the increase in "long-range truck traffic" to "out-of-state" sites produces a "more severe impact." The rationale for why this would "still be less than significant" should be provided.
45	Chapter 14	14-40	In the second paragraph, the Air Quality impact of the increase in emissions due to increased miles traveled is described as "more severe." The rationale for why this impact would "be less than significant" should be provided.
46	Appendix A	Page 14	Prohibition No. 14 should be amended as follows: "... 50 percent is prohibited..."

In conclusion, CSDLAC supports the continued beneficial use of biosolids in California via the adoption of the Modified General Order for the land application of both Class B and Class A biosolids. We urge the SWRCB to consider the findings of the January 2004 Revised Draft PEIR that identifies the Modified General Order as the environmentally superior alternative. The County Sanitation Districts of Los Angeles County appreciate every opportunity to provide input to this process and would like to thank all concerned for their efforts in preparation of the PEIR. Should you have any questions or require any additional information, please do not hesitate to contact me at (562) 699-7411, extension 2824.

Very truly yours,



Michael Sullivan
Supervising Engineer
Technical Services Department



CALIFORNIA ASSOCIATION of SANITATION AGENCIES

925 L Street, Suite 1400 Sacramento, CA 95814 TEL: (916) 446-0388 – FAX (916) 448-4808

March 11, 2004

Honorable Arthur G. Baggett Jr., Chair and Members
California State Water Resources Control Board
1001 "I" Street
Sacramento, California 94815

Subject: **Draft Revised Statewide Program Environmental Impact Report
(PEIR) Covering General Waste Discharge Requirements for
Biosolids Land Application (February 2004)**

Dear Chairman Baggett and Members of the Board:

On behalf of the California Association of Sanitation Agencies (CASA) I would like to express appreciation for the significant amount of time and effort the State Water Resources Control Board (SWRCB) staff has dedicated to the development of the Draft Revised Statewide Program EIR Covering General Waste Discharge Requirements for Biosolids Land Application (February 2004 Revised Draft PEIR). The February 2004 Revised Draft PEIR indicates that the Modified General Order, which permits land application of Class B biosolids, is the environmentally superior alternative. CASA supports this conclusion and urges the Board to adopt a revised Modified General Order to allow for the continued land application of biosolids. Biosolids land application provides valuable nutrients and soil conditioners to our agricultural land and represents a beneficial use of biosolids that is in the management of California's biosolids.

CASA represents over 105 wastewater treatment agencies in California who serve approximately 85% of the sewered population in the State. Biosolids management represents a challenge to each one of our member agencies. Regional conditions have severely limited the number and type of biosolids management options that are available to many agencies. Because there is no "one-size fits all" approach to biosolids management in California, it is imperative to preserve all environmentally sound options so that all of our wastewater treatment agencies have access to a practical and affordable means of biosolids management.

Background

As you are aware, the PEIR was previously certified in 2000. Subsequent litigation and a resultant court ruling has dictated additional analysis for two of the project alternatives. These alternatives are the Class A Only Alternative and the Food Crop Limitation Alternative. The detailed analysis of these two alternatives is presented in the February 2004 Revised Draft PEIR. The result of the additional analyses is that the Modified General Order remains the environmentally superior alternative.

We support this conclusion and provide the Board with the following supplemental information which illustrates the need for and benefits of the land application of both Class B and Class A biosolids.

The majority of wastewater treatment plants in California currently treat biosolids to Class B standards. Class B biosolids are produced at the wastewater treatment plant by the digestion of raw sludge that is produced during the wastewater treatment process, and subsequent dewatering of the digested material. The resultant product has detectable levels of pathogens that rapidly die off when land applied in accordance with the management techniques required under the United States Environmental Protection Agency Part 503 Rule (Part 503 Rule). It should be noted that the site management requirements set forth in the Modified General Order are significantly more stringent than those required under the Part 503 Rule.

Few wastewater treatment plants in California currently have the capability to produce a Class A product. Class A biosolids are produced by chemical stabilization, composting, heat drying, and anaerobic digestion at higher than conventional temperatures, among other processes. The resultant product is essentially free of pathogens prior to land application and thus the additional management parameters required for Class B biosolids are not required for Class A biosolids under the Part 503 Rule. Due to the pathogen reduction treatment process, Class A materials often have somewhat lower soil nutritive values than Class B materials. The requirements set forth in the Modified General Order for the management of Class A biosolids adds to the safety factor provided by the Part 503 Rule.

Essentially, the difference between the properties of Class B and Class A biosolids is the relative level of pathogens, which is equalized by management techniques, though at a loss of relative soil nutritive values. Additional differences lie with the impacts of production, available capacity, capital investment requirements, the relative costs of production, and facility siting issues. A brief discussion of these differences is provided below. Although not directly related to environmental impacts, these differences are significant and we urge you to consider them in the context of societal and economic impacts.

Impacts of Production

As the February 2004 Revised Draft PEIR indicates, the production and management of Class B biosolids generally has lesser environmental impacts than the production of Class A biosolids with respect to truck traffic, air quality, and energy use.

Available Capacity

Approximately 54% of the biosolids generated in California are currently managed via land application of Class B product whereas approximately 16% are treated to Class A levels. There is currently insufficient Class A treatment capacity available in California to accommodate all of the material that is currently treated to Class B standards.

Although some agencies and cities have moved to Class A technologies for biosolids management, these are the exception rather than the rule.

Capital Investment Requirements

Capital investment is required in most instances to convert a treatment process from the production of Class B material to the production of Class A material. The costs for site acquisition and necessary capital equipment, which can include numerous structures, dryers, boilers, blowers, biofilters, bagging facilities, conveyors, loaders, and screeners, are estimated to be as high as \$58M for a single agency. Statewide, these costs can be expected to be on the order of \$500M to \$1B. These costs reflect only the necessary capital expenditure to convert from Class B to Class A technologies and do not include the substantially increased operating costs that would also result. While significant for any wastewater treatment agency, the impact of such capital costs is generally far more acute for the many small wastewater treatment agencies located in California.

Relative Cost of Production

Operating and maintenance costs associated with Class B biosolids are generally lower than those for Class A biosolids. The cost differences lie in significant increases in energy consumption, chemicals used for chemical stabilization, bulking materials for composting, and labor to operate the systems used to produce Class A biosolids. Differences can result in an increased per dry ton management cost for Class A biosolids on the order of 100% greater than those for Class B.

Facility Siting

Class B biosolids are produced at the wastewater treatment facility as part of the typical wastewater treatment process. Depending upon the treatment process, Class A biosolids can be produced at the wastewater treatment facility or off-site, at a dedicated facility. Siting of facilities to produce Class A biosolids can pose a challenge due to issues involving the onerous permitting requirements, public acceptance issues, availability of land, the location of land relative to populated areas, and the distance of suitable sites relative to the wastewater treatment facility.

Conclusion

While the overall impact of producing and land applying Class B biosolids is somewhat less than that associated with the production of Class A biosolids, CASA considers both to be environmentally sound and necessary biosolids management techniques. As such we support the availability of both options to California's wastewater treatment agencies.

The environmentally superior alternative identified in the February 2004 Revised Draft PEIR as the Modified General Order does just that. The Modified General Order regulates the land application of biosolids, including both Class B and Class A materials, making both of these management options available to California's wastewater treatment agencies. It is important to note that the land application of Class B biosolids remains the most widely used management option for biosolids in California as well as the in the United States.

CASA believes that the land application of biosolids is an integral aspect of a statewide program that encourages beneficial use. Environmental benefits of land application include reduced water consumption resulting from an improved soil structure and the addition of valuable nutrients to the soil. The safety of biosolids is underscored by decades of scientific research, including two studies by the National Academy of Sciences, and biosolids are one of the most studied materials ever regulated by the United States Environmental Protection Agency.

In summary, CASA supports the continued beneficial use of biosolids in California via the adoption of a revised Modified General Order which would allow for the continued land application of both Class B and Class A materials. We urge the SWRCB to adopt the findings of the February 2004 Revised Draft PEIR that identifies the Modified General Order as the environmentally superior alternative. Significant requirements and restrictions, beyond those contained in federal regulations, have been included in the Modified General Order which are more than protective of public health and the environment. We believe that a revised Modified General Order would continue these protections as well as the environmental benefits.

Sincerely,

Marlaine Hudnall
Biosolids Program Manager
California Association of Sanitation Agencies



L-9

Sharon Green
Tri-TAC Chair
Sanitation Districts of Los Angeles County
P.O. Box 4998
Whittier, CA 90607
(562) 699-7411, ext. 2503
sgreen@lacsdsd.org

March 15, 2004

Honorable Arthur G. Baggett Jr., Chair and Members
California State Water Resources Control Board
1001 "I" Street
Sacramento, California 94815

Subject: **Draft Revised Statewide Program Environmental Impact Report
(PEIR) Covering General Waste Discharge Requirements for
Biosolids Land Application (February 2004)**

Dear Chairman Baggett and Members of the Board:

On behalf of Tri-TAC I would like to express appreciation for the significant amount of time, effort and resources that the State Water Resources Control Board (SWRCB) staff has dedicated to the development of the Draft Revised Statewide Program EIR Covering General Waste Discharge Requirements for Biosolids Land Application (Draft PEIR). The Draft PEIR indicates that the Modified General Order, which permits land application of Class B biosolids, is the environmentally superior alternative. Tri-TAC supports this conclusion and urges the Board to certify the Draft PEIR and adopt a revised Modified General Order to allow for the continued land application of both Class A and Class B biosolids. Biosolids land application provides valuable nutrients and soil conditioners to our agricultural land and represents a beneficial use of biosolids that is important for the sustainable management of California's biosolids.

Tri-TAC is a technical advisory group for Publicly Owned Treatment Works (POTWs) in California. Tri-TAC is jointly sponsored by the California Association of Sanitation Agencies, the California Water Environment Association, and the League of California Cities. The constituency base for Tri-TAC collects, treats, and reclaims more than two billion gallons of wastewater each day and serves most of the sewered population of California. As generators of biosolids, or treated sewage sludge, Tri-TAC's members are responsible for finding environmentally safe and cost effective ways to manage over three million of tons of biosolids every year. The beneficial use of both Class B and Class A biosolids in agriculture continues to be an environmentally sound management option for most of California's communities.

Regional conditions in California have severely limited the number and type of biosolids management options that are available to many agencies. Because there is no "one-size fits all" approach to biosolids management, it is imperative to preserve all environmentally sound options so that wastewater treatment agencies throughout California have access to all practical and affordable means of biosolids management.

**Vice Chair
Chuck Weir**

East Bay Dischargers
Authority
2651 Grant Avenue
San Lorenzo, CA 94580
cweir@ebda.org

**Water Committee
Co-Chairs**

Ben Horenstein
East Bay Municipal
Utility District
375 11th St. MS702
Oakland, CA 94623
(510) 287-1846
bhorenst@ebmud.com

Traci Minamide
City of Los Angeles
433 S. Spring St., Suite 500
Los Angeles, CA 90013
(213) 473-8541
tminami@san.lacity.org

Air Committee Chair

Jackie Kepke
CH2M Hill
155 Grand Ave., Suite 1000
Oakland, CA 94612
(510) 251-2426
jkepke@ch2m.com

**Land Committee
Co-Chairs**

Layne Baroldi
Orange County
Sanitation District
P.O. Box 9127
Fountain Valley, CA 92728
(714) 593-7456
lbaroldi@ocscd.com

Maura Bonnarens

East Bay Municipal
Utility District
375 11th St., MS702
Oakland, CA 94623
(510) 287-1141
mbonnare@ebmud.com

Background (Draft PEIR)

The SWRCB's specifically performed a detailed analysis of two additional project alternatives, the Class A Only Alternative and the Food Crop Limitation Alternative in the Draft PEIR and determined that the Modified General Order continued to be considered the environmentally superior alternative. Tri-TAC supports this conclusion. This choice by the SWRCB is also strongly supported by EPA's extensive scientific analysis that has concluded that when Class B biosolids are applied to land in accordance with the Part 503 site restrictions, they pose no more threat to human health or the environment than Class A biosolids. Simply put, EPA makes this point succinctly by stating "Class A = Class B + Site Restrictions + Management Practices."

The Draft PEIR set forth a very detailed analysis of potential threats to the public posed by the land application of biosolids. This analysis is supported by an extensive technical Appendix. The Draft PEIR described in detail the contaminants that may be present in biosolids (such as pathogens and heavy metals), and the various ways that human beings could be exposed to these pollutants (e.g., through direct contact, inhalation or ingestion of food). The Draft PEIR also described in detail the health effects that may result from exposure to the pollutants. After describing existing regulations that protect public health from exposure to these pollutants, the Draft PEIR painstakingly analyzed the potential risks to human health through exposure to specified pollutants by particular routes of exposure. The Draft PEIR rightfully concluded that, after mitigation measures are implemented pursuant to the Modified General Order, all of the potential risks are reduced to a level of insignificance.

The Draft PEIR relied in part upon the numerous studies and volumes of Technical Support Documents generated by EPA during its Part 503 regulatory program development that accurately portrays the minimal risk to public health posed by the land application of biosolids. The Part 503 regulations were the culmination of a concerted eleven-year effort by EPA to identify and control the risks potentially posed by the land application of biosolids. EPA described its Part 503 investigation of biosolids as an "unprecedented effort" to assess the potential for contaminants to affect human health and the environment. After considering the risks of potential pollutants, EPA narrowed the list and prepared detailed risk assessments examining 14 separate "pathways" by which each of the pollutants may be able to travel from biosolids to humans or animals. EPA's Science Advisory Board reviewed and approved the risk assessment methodologies which were used for studying the land application of biosolids. EPA scientists conducted the initial biosolids risk assessments using highly conservative assumptions and worst-case exposure data in order to ensure protection of public health and the environment.

After the Part 503 regulations were issued, the National Research Council (NRC) subjected them to an extensive three-year review. In 1996, the NRC concluded that the Part 503 standards for biosolids application "... are adequate to assure the safety of crops produced for human consumption." In 2002, a subsequent report by the NRC stated that there is no documented scientific evidence that the Part 503 rule has failed to protect public health. This finding further reinforced what many years of operating history at numerous biosolids facilities have shown. (Attachment 1)

In addition to reviewing the EPA's Part 503 regulatory program, the SWRCB conducted its own comprehensive review of the relevant, peer-reviewed scientific literature published since 1993 to ensure that no new information had developed that cast EPA's Part 503 conclusions in doubt. The SWRCB also performed additional research to identify conditions specific to California that might not have been contemplated by the Part 503 regulations, reviewed state regulations pertaining to biosolids and consulted with numerous qualified experts. Throughout the assessment of public health impacts, the SWRCB assumed "worst-case conditions" in order to provide maximum protection of public health.

Tri-TAC recognizes that the SWRCB also considered a variety of empirical evidence showing that,

despite the widespread use of biosolids on farmland over the course of many years, the practice has not created any public health problems. In California, there has been no correlation between the outbreak of disease associated with pathogens in biosolids and the counties where most biosolids are applied to the land. The Draft PEIR further notes that studies of wastewater workers in general show that they have no incidence of disease that is higher than that of the general population. Even more compelling, studies comparing the health of farm workers on farms using biosolids with the health of farm workers on farms not using biosolids show no difference in the amount or severity of health problems. The Draft PEIR further notes that there have been no reported cases in California of air borne transmission of biosolids pollutants, contamination of drinking water with biosolids pollutants or disease caused by the presence of biosolids pollutants in surface water.

Background (Modified General Order)

Tri-TAC is well aware that for decades, local Regional Water Quality Control Boards have regulated the land application of biosolids by issuing site-specific individual "waste discharge requirements" pursuant to Water Code § 13263. In 1995, however, the legislature adopted Water Code § 13274 directing the SWRCB or the local RWQCBs to prescribe "general" waste discharge requirements for the biosolids application. General waste discharge requirements are broad rules set by the SWRCB or the RWQCBs to regulate an entire category of waste discharges involving the same type of operations, waste and treatment standards.

Section 13274 requires that the general waste discharge requirements for biosolids set "minimum standards" for land application. Section 13274 specifically directs that the waste discharge requirements contain provisions to "mitigate significant environmental impacts, potential soil erosion, odors, the degradation of surface water quality or fish or wildlife habitat, the accidental release of hazardous substances, and any potential hazard to health or safety." The provisions of the Modified General Order were based largely on the Part 503 regulations in order to ensure that the Modified General Order incorporates the extensive health risk assessments and scientific review that went along with the Part 503 regulations.

The Modified General Order contains many additional regulatory requirements designed to protect human health and the environment that are not contained in the Part 503 regulations, in order to account for California-specific conditions and ensure a conservative approach to the regulation. Unlike the Part 503 Regulations, for example, the Modified General Order is not self-executing for land applicators. Instead, the Modified General Order creates a permitting process whereby applicators must obtain permits from the local RWQCB, thus allowing RWQCBs to review and regulate land application in light of site-specific factors. The Modified General Order still allows RWQCB's to issue individual waste discharge requirements that are more stringent than those set forth in the Modified General Order if site-specific conditions so warrant.

The Modified General Order contains a variety of additional controls designed to minimize the release of, and exposure to, pollutants and pathogens. The Modified General Order goes beyond the Part 503 Regulations, for example, by prohibiting biosolids land application within certain specified distances ("setbacks") from property lines, municipal and agricultural supply wells, public roads, surface waters, agricultural buildings, residential buildings, water bodies and areas defined as having a "high potential for public exposure" such as recreation areas, schools, hospitals, and public assembly areas. The Modified General Order also imposes detailed storage and transportation requirements designed to prevent runoff, leaching and other release of pollutants and pathogens.

The Modified General Order also extends the Part 503 grazing restrictions to allow additional time for biodegradation of synthetic organic compounds ("SOC") and pathogen destruction. The Modified

General Order prohibits surface water runoff from irrigation of biosolids application sites for within 30 days after application of the biosolids, unless there is vegetation buffer of at least 33 feet. The Modified General Order mandates additional vector attraction by requiring that biosolids must be incorporated within specified times after application, either 24 hours or 48 hours. The Modified General Order also minimizes runoff of pollutants and pathogens from steep slopes, by requiring applicers to obtain an erosion control plan prepared by specified professionals where application slope is greater than 10%.

The Modified General Order contains additional controls designed to protect groundwater from pollutants. The Modified General Order generally prohibits biosolids application at rates that would degrade groundwater quality, regardless of the agronomic rate of the crop. Moreover, unlike the Part 503 Regulations, the Modified General Order requires applicers to conduct groundwater monitoring at application sites where the distance to groundwater is less than 25 feet. Groundwater monitoring is designed to detect and prevent any groundwater impacts that may occur.

Environmental Impacts without the Modified General Order

The vast majority of wastewater treatment plants in California currently treat biosolids on-site to Class B pathogen standards. The resultant product has detectable levels of pathogens that rapidly die off to Class A levels when land applied in accordance with the management requirements set forth in the Modified General Order. Without adoption of the Modified General Order, public agencies whose biosolids have been land applied would be required to develop alternative locations for Class B application or develop methods for additional treatment. Without a Modified General Order, most wastewater agencies would be compelled to convert their Class B biosolids into Class A biosolids or dispose of their biosolids in landfills.

Tri-TAC concurs with the Draft PEIR finding that the selection of a Class A Only Alternative or the Food Crop Limitation Alternative would create a number of adverse environmental impacts while not significantly increasing the protection to human health or the environment. These adverse environmental impacts include: (1) a substantial increase in overall vehicular traffic and fuel consumption due to the transport of biosolids to other states, or distant treatment facilities; (2) treatment to a Class A level which frequently reduces the fertilizer value of the biosolids; (3) addition of metals or other pollutants as part of the treatment processes (for some Class A processes); (4) consumption of significant amounts of natural gas and/or electricity (for many Class A processes); (5) the increased use of concentrated commercial fertilizers and animal manures which could cause increased irrigation water needs, potential groundwater contamination and lower crop yields; (6) potential cases of human infection from use of animal manure as a fertilizer instead of biosolids (there have been *documented* cases of human infection from pathogen contamination of food grown on land treated with animal manure); and (7) increased need for landfill space and more biosolids incinerators, affecting the shortage of landfill space and air quality due to air emissions.

Tri-TAC commends the SWRCB staff on their thorough analysis of the environmental impacts that would result if the Class A Only Alternative or Food Crop Limitation Alternative were selected. It is Tri-TAC's hope that local governments will avail themselves of the information in the Draft PEIR and the Modified General Order as they evaluate future regulations at the local level for use of Class B biosolids within their jurisdictions. Until then, Class B biosolids will continue to be hauled long distances to land application and Class A biosolids treatment facilities.

For numerous reasons, most of the developed or proposed Class A biosolids treatment facilities and management sites are located in either the Central Valley of California or in Arizona. As such, under the Class A Only Alternative, the transportation fuel requirements will be quite similar to that in today's distant Class B biosolids land application operations. However, as accurately noted in the Draft PEIR,

this fuel consumption impact will be compounded by the fact that once the Class B biosolids reach their Class A biosolids treatment facilities in the Central Valley or in Arizona, a significant amount of additional electrical and natural gas energy will be required by an array of equipment including dryers, boilers, blowers, biofilters, bagging facilities, conveyors, loaders, and screeners, etc., to convert the Class B biosolids into Class A biosolids, for no environmental benefit.

A few specific examples of such treatment facilities include Synagro's proposed 800 ton per day compost facility in Kern County, Synagro's 500 ton per day compost facility in La Paz County, Arizona, Tule Ranch's 600 ton per day chemical stabilization facility in Kern County, the Westlake Farms' proposed 1,350 ton per day compost facility in Kings County, the Yakima Company's biosolids drying facility in La Paz County, Arizona, and the City of Los Angeles farm in Kern County that uses thermophilicly digested biosolids. The energy consumption at these composting facilities is significantly compounded by the fact that an equal amount of bulking agent must also be trucked in and the resultant product must then be trucked out. These examples support the SWRCB's analysis that a significant increase in energy consumption would result from the Class A Only Alternative.

Currently, there is insufficient Class A biosolids treatment and landfill capacity within 250 miles of the Los Angeles Basin. Only one significant local Class A biosolids facility that could manage 400 tons of biosolids per day has been proposed for the Los Angeles Basin. Biosolids can be used as Alternative Daily Cover (ADC) at landfills. Use of biosolids as ADC counts as AB 939 diversion credit in some instances, but there is quite a lot of competition for materials to be used as ADC and thus biosolids are just one of many materials in line for this use. Further, ADC demand is not consistent statewide (some landfills use available on-site soils, etc). Again, there is not sufficient ADC capacity to accommodate all of the biosolids generated in the state nor is it the best and highest use of biosolids. Recognizing that there are some severe regional constraints in this state that render the use of landfills for disposal and ADC necessary for some agencies, Tri-TAC believes it is in the best interest of the state to keep every viable management option for biosolids management open. Tri-TAC does not support foreclosing management options for biosolids simply because of negative perception. Considering the environmental benefits to be realized, it is important to local POTWs that all feasible and cost-effective biosolids management options be available, especially considering that the state produces over three million tons of biosolids per year.

It is also important to note the economic impacts that would result from the selection of the Class A Only Alternative, in the form of an increase in capital and operational costs for biosolids management. Capital costs for the development of major composting facilities often exceed \$50,000,000. This cost, along with the corresponding boost in operation and maintenance costs for increased energy consumption, chemicals used for chemical stabilization, bulking materials for composting, and labor to operate the systems used to produce Class A biosolids, often results in biosolids management costs approaching, if not exceeding, \$70 per ton. Prior to local bans on the land application of Class B biosolids in the Central Valley, biosolids management cost were approximately \$25 per ton. Although not directly related to environmental impacts, these cost differences are significant and we urge you to consider them in the context of societal and economic impacts.

EPA Actions Since the August 2000 PEIR Certification

Since the previous version of the PEIR was certified by the SWRCB in 2000, several important biosolids-related recommendations and actions have been taken by the EPA that should be part of the record considered by the SWRCB. These are briefly summarized below.

Response to the Center for Food Safety Petition

On December 22, 2003, EPA denied a petition submitted by the Center for Food Safety seeking an emergency moratorium on the land application of biosolids. In EPA's 23-page response (Attachment 2), it found that the assertions made by the petitioners concerning the hazards of land-applied biosolids were not substantiated. Specifically, the petition was based on three claims: adverse health effects; the presence of toxic chemical pollutants in biosolids that are not regulated in EPA's regulation of biosolids; and two reports by EPA's Office of Inspector General that document concerns with program oversight. Each of these claims was rejected due to a lack of supporting evidence to substantiate the claims. In the letter, EPA did provide specific supporting information regarding their denial of each of the claims, including the allegations of human and animal deaths. EPA's decision not to ban the land application of biosolids is consistent with the findings of the NRC's July 2002 report on the land application of biosolids, that there is no documented scientific evidence that EPA's regulations have failed to protect human health.

With respect to the Center for Food Safety's claim that there exists "unregulated" toxic chemical pollutants in biosolids, EPA states that contrary to the claim that biosolids are an inherently unpredictable mixture, the nature of the wastewater treatment process is such that biosolids are inherently consistent. EPA further state that there is no evidence cited in the petition or known to EPA that land application of biosolids has resulted in toxic levels of pollutants in the receiving soils. Finally, EPA states that although there is an on-going process to evaluate additional toxic pollutants for additional regulation under the Clean Water Act, this evaluation does not support the contention that these pollutants are of concern in land applied biosolids.

EPA Letter Affirms Support of Biosolids Program to State Coordinators

On October 31, 2003, EPA responded to a letter sent on behalf of state biosolids coordinators that called on EPA to clarify its position on biosolids recycling (Attachment 3). The state letter was sent in light of a statement made by an EPA official during an October 29, 2003 CBS Evening News story on biosolids. The response affirmed EPA's support of land application, incineration and disposal in municipal solid waste landfills and surface disposal units performed in compliance with Part 503 as viable options for the use and disposal of biosolids. Furthermore, the letter stated that "the sound management of the biosolids program will continue to be an important element of the National Water Program." The letter also stressed EPA's continued support for state and regional biosolids activities and efforts by the National Biosolids Partnership to advance environmental management systems (EMS) for biosolids at POTWs.

Dioxins

The Clean Water Act requires EPA to review the Part 503 regulations periodically to determine if pollutants not considered in the first two rounds of the Part 503 regulatory development should be evaluated for potential addition to the Part 503 regulation. On December 31, 2003, EPA published the results of this activity. EPA gathered information on 803 pollutants that had been monitored for in the 1988-89 National Sewage Sludge Survey or have been reported in U.S. or foreign scientific literature. EPA then gathered physical, chemical, and toxicological data from the scientific literature or recognized data bases on these pollutants.

One such pollutant that was recently examined was dioxins. EPA announced on October 17, 2003 that it has made a final decision not to regulate dioxins in land-applied biosolids (Attachment 4). After five years of study, including outside peer review, EPA determined that dioxins from the land application of biosolids do not pose a significant risk to human health or the environment. The most highly exposed people, theoretically, are those people who apply biosolids as a fertilizer to their crops and animal feed and then consume their own crops and meat products over their entire lifetime. EPA's analysis shows that even for this theoretical population, only 0.003 new cases of cancer could be expected each year or only

0.22 new cases of cancer over a span of 70 years. The risk to people in the general population of new cancer cases resulting from biosolids containing dioxin is even smaller due to lower exposures to dioxin in land-applied sewage sludge than the highly exposed farm family which EPA modeled.

Airborne Pathogens

EPA is tracking a series of studies on airborne pathogens that are being sponsored by the National Science Foundation and are being conducted by the University of Arizona's Water Quality Center. These studies have measured emissions of numerous pathogens from biosolids-amended fields and have modeled ambient air concentrations of these pathogens. The results have indicated that nearby residents of these fields would have extremely low risks from pathogen exposure. EPA has no evidence to indicate that the emissions of pathogens in combination with volatile chemicals and particulates increase the risk of pathogenic disease above the risks from exposure to pathogens alone to nearby residents of biosolids land application sites.

Cattle Feed in Augusta Georgia

Input from EPA was instrumental in the Superior Court of Richmond County, Georgia decision on February 11, 2004 to dismissed claims filed by McElmurray Farm that Class B land-applied biosolids from Augusta Georgia caused the deaths of dairy cows in the 1990s. The plaintiffs filed an original complaint on February 2, 2001 alleging 12 causes of action seeking \$15 million in damages. The Court decision cited 15 main reasons that the plaintiffs failed to prove that the land applied biosolids caused the damages during the legal proceedings, including insufficient evidence based on speculation or conjecture. Scientific evidence showed that the farmlands in question did not have elevated levels of metals. The deceased cattle were found to have died from common dairy cow diseases not related to the land application of biosolids. (Attachments 5 & 6)

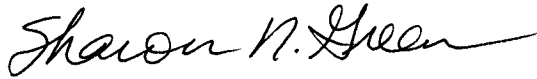
Conclusion

While the overall impact of producing and land applying Class B biosolids is somewhat less than that associated with the production of Class A biosolids, Tri-TAC considers both to be environmentally sound and necessary biosolids management techniques. As such, we believe both options should be allowed in California. The environmentally superior alternative identified in the Draft PEIR and the Modified General Order does just that. The Modified General Order regulates the land application of biosolids, including both Class B and Class A materials, making both of these management options available to California's wastewater treatment agencies. It is important to note that the land application of Class B biosolids remains the most widely used management option for biosolids in California, as well as throughout the United States. Tri-TAC believes that the land application of biosolids should be an integral component of a statewide program that encourages beneficial use. The environmental benefits of land application include reduced water consumption resulting from an improved soil structure and the addition of valuable nutrients to the soil.

In summary, Tri-TAC supports the continued beneficial use of biosolids in California via the adoption of the Modified General Order which would allow for the continued land application of both Class B and Class A biosolids. We urge the SWRCB to adopt the findings of the Draft PEIR that identifies the Modified General Order as the environmentally superior alternative. Significant requirements and restrictions, beyond those contained in the Part 503 regulations, have been included in the Modified General Order to create a regulation that is extremely protective of public health and the environment. We believe that the Modified General Order appropriately balances environmental and human health protection with the environmental benefits of biosolids land application.

Thank you for your consideration of our comments. If you have any questions about our comments, please contact Layne Baroldi or Maura Bonnarens, Land Committee Co-Chairs.

Sincerely,



Sharon N. Green
Chair

Attachments:

1. Federal Register Notice dated December 31, 2003 (EPA's Response to NAS Report).
2. U.S. EPA Letter from Tracy Mehan Dated December 2003 in Response to Center for Food Safety Petition
3. U.S. EPA Letter from Tracy Mehan and Paul Gilman dated October 31, 2002.
4. EPA Makes Final Decision on Dioxin in Sewage Sludge used in Land Applications, Press Release Dated October 17, 2003.
5. Jim Ellison Letter to EPA Dated October 20, 2003 in Response to Claims Made in the Center for Food Safety regarding the facts of the Boyceland Dairy case. Mr. Ellison is the lead counsel for the defendant (Augusta, Georgia) in the Boyceland Dairy case.
6. Superior Court of Richmond County Order and Judgment; Jennifer McElmurray, et al Plaintiffs v Augusta-Richmond County Defendant, Dated February 11, 2004

cc: Wayne Verrill, State Water Resources Control Board
Marlaine Hudnall, California Association of Sanitation Agencies
Yvonne Hunter, League of California Cities
Elizabeth Allan, California Water Environment Federation
Michael Moore, Water Environment Federation



Association of
Metropolitan
Sewerage Agencies

President
Thomas R. "Buddy" Morgan
General Manager
Water Works & Sanitary
Sewer Board
Montgomery, AL

Vice President
William B. Schatz
General Counsel
Northeast Ohio Regional
Sewer District
Cleveland, OH

Treasurer
Donnie R. Wheeler
General Manager
Hampton Roads Sanitation
District
Virginia Beach, VA

Secretary
Dick Champion
Director
Water Pollution Control
Department
Independence, MO

Executive Director
Ken Kirk

March 15, 2004

Honorable Arthur G. Baggett Jr., Chair
California State Water Resources Control Board
P. O. Box 100
Sacramento, California 94812-0100

Re: **State Water Resources Control Board (SWRCB) Draft Revised
Statewide Program Environmental Impact Report (PEIR)
Covering General Waste Discharge Requirements for Biosolids
Land Application (January 2004)**

Dear Chairman Baggett and Members of the Board:

The Association of Metropolitan Sewerage Agencies (AMSA)¹, on behalf of its more than thirty members in California, appreciates the opportunity to comment on the California State Water Resources Control Board (SWRCB) Draft Revised Statewide Program Environmental Impact Report (PEIR) Covering General Waste Discharge Requirements for Biosolids Land Application (Modified General Order). As generators of biosolids, AMSA's members are responsible for finding environmentally safe and cost effective ways to manage millions of tons of biosolids every year. The PEIR and re-adoption of the Modified General Order will provide a uniform regulatory process and allow AMSA's members in California to continue biosolids land application in an environmentally safe and beneficial manner.

Land application of biosolids continues to be one of the most viable and environmentally sound management options for many communities in the United States. The U.S. Environmental Protection Agency (EPA), in its response to the National Research Council's 2002 report² on the technical

¹ Founded in 1970, AMSA represents the interests of nearly 300 of the nation's publicly owned wastewater utilities. AMSA members serve the majority of the sewered population in the United States and collectively treat and reclaim over 18 billion gallons of wastewater every day.

² *Biosolids Applied to Land: Advancing Standards and Practices* (NRC, 2002)

basis of the 40 CFR Part 503 biosolids regulations, reaffirmed its long-standing position that "the land application of sewage sludge in compliance with EPA's regulations is an appropriate choice for communities" and reiterated the most prominent conclusion of the NRC report that there is no scientific evidence that the Part 503 regulations have failed to protect human health. AMSA understands from its members in California that the Modified General Order not only incorporates all of the Part 503 requirements but also adds numerous requirements and restrictions that are more stringent than the federal regulations in order to further protect California's unique environment. AMSA believes that such an approach is an effective way to provide uniform requirements throughout the state that are protective of human health and the environment, while also streamlining the regulatory process.

AMSA also understands that the Modified General Order would govern the land application of both Class B and Class A biosolids, preserving both of these management options for California's wastewater treatment agencies. AMSA believes this approach is consistent with the scientific foundation of the Part 503 regulations and represents the most sound policy decision for both the environment and the biosolids management community.

AMSA urges the SWRCB to consider the findings of the Draft Revised PEIR that identify the Modified General Order as the environmentally superior alternative and re-adopt the General Order.

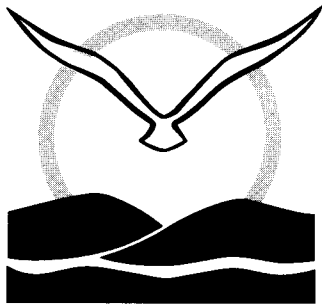
Sincerely,

A handwritten signature in black ink, appearing to read "K Kirk".

Ken Kirk

Executive Director

CC: Mr. Gary Carlton, SWRCB Board Member
Mr. Richard Katz, SWRCB Board Member
Mr. Peter Silva, SWRCB Board Member
Ms. Nancy Sutley, SWRCB Board Member

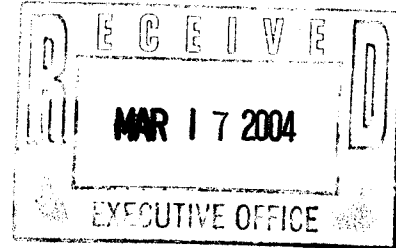


Bay Area Clean Water Agencies

Leading the Way to Protect Our Bay
A Joint Powers Public Agency

P.O. Box 24055, MS 702
Oakland, California 94623

March 15, 2004



Honorable Arthur G. Baggett Jr., Chair and Members
California State Water Resources Control Board
1001 "I" Street
Sacramento, CA 94815

Dear Chairman Baggett and Members of the Board:

**Subject: Draft Revised Statewide Program Environmental Impact Report (PEIR)
Covering General Waste Discharge Requirements for Biosolids Land
Application (February 2004)**

The membership of the Bay Area Clean Water Agencies (BACWA) appreciates the significant amount of time and effort invested by the State Water Resources Control Board in the development of the Draft Revised Statewide Program EIR (PEIR) and the Modified General Order, which will allow for the continuance of a streamlined regulatory process for land applying biosolids in California. The re-adoption of the Modified General Order will allow BACWA member agencies to continue Class B biosolids land application in an environmentally safe manner, and also help with the diversion of waste from California's landfills.

BACWA is comprised of local governmental agencies that are leaders in wastewater management and public stewardship of San Francisco Bay water quality. BACWA members own and operate publicly owned treatment works (POTWs) that discharge to highly treated wastewater to the San Francisco Bay Estuary. Together, BACWA's members serve over 5 million people in the nine-county Bay Area, treating all domestic, commercial and a significant amount of the industrial wastewater. BACWA was formed to develop a region-wide understanding of the watershed protection and enhancement needs through reliance on sound technical, scientific, environmental and economic information and ensure that this understanding leads to long-term stewardship of San Francisco Bay.

While never forgetting that our most important responsibility is to protect public health and the environment, are also stewards of their ratepayers' fees. As such BACWA believes that compliance with the stringent Modified General Order requirements not only protects public health and the environment but also allows for the continued use of a cost-effective means to manage California's biosolids through the land application of Class B biosolids.

Honorable Arthur G. Baggett Jr.
March 15, 2004
Page 2

We support the conclusions set forth in the PEIR and the re-adoption of the Modified GO, based on the demonstrated benefits of biosolids reuse. Biosolids reuse has been shown to be a positive environmental practice that is strongly encouraged by the United States Environmental Protection Agency (EPA). The EPA federal biosolids regulation (Part 503 rule) took nine years to develop and was based on more than 40 years of biosolids field research, including research performed in California.

The Modified General Order not only incorporates all of the Federal regulations, but also adds numerous requirements and restrictions that are more stringent than the federal regulations in order to protect conditions specific to California's unique environment. The Modified General Order ultimately provides for uniform requirements for biosolids recycling in California that is both protective of public health and the environment.

BACWA supports the continued land application of Class B biosolids in California. BACWA also recognizes that it is important for the POTWs in the Bay Area to have multiple options available to them for alternative means of biosolids recycling or disposal. Management of Class A biosolids is also an environmentally sound (albeit with slightly higher environmental impacts and slightly lower nutrient value than that Class B management option and thus we support the availability of both options for biosolids management. We believe that the Modified GO leaves both options available without placing unnecessary financial burdens on our ratepayers.

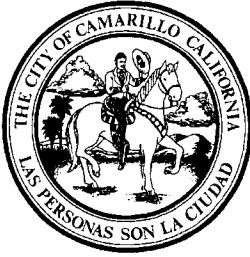
In conclusion, BACWA supports the continued beneficial use of biosolids in California via the re-adoption of the Modified General Order for the land application of biosolids, which includes both Class B and Class A materials. We urge the SWRCB to adopt the findings of the February 2004 Revised Draft PEIR that identifies the Modified General Order as the environmentally superior alternative.

Thank you.

Sincerely

A handwritten signature in dark ink, appearing to read "J. Kelly".

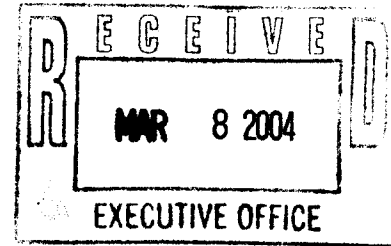
James M. Kelly
Chair, BACWA Executive Board



CAMARILLO SANITARY DISTRICT

601 Carmen Dr. P O Box 248, Camarillo, CA 93011-0248

*Department of Public Works
Sanitation District Office
(805) 383-5309*



March 2, 2004

Honorable Arthur G. Baggett Jr., Chair
California State Water Resources Control Board
1001 "I" Street
Sacramento, California 94815

**Subject: State Water Resources Control Board (SWRCB) Draft Revised Statewide
Program Environmental Impact Report (PEIR) Covering General Waste
Discharge Requirements for Biosolids Land Application (January 2004)**

Dear Chairman Baggett and Members of the Board:

The Camarillo Sanitary District (CSD) would like to take this opportunity to express its appreciation for the significant amount of time and effort the State Water Resources Control Board (SWRCB) staff has dedicated to the development of the Draft Revised Statewide Program EIR (PEIR) Covering General Waste Discharge Requirements for Biosolids Land Application (Modified General Order). The PEIR, along with the Modified General Order, will allow for the continuance of a streamlined regulatory process for land applying biosolids in California. The re-adoption of the Modified General Order will allow CSD to continue biosolids land application in an environmentally safe manner and help with the diversion of waste from California's landfills.

Biosolids reuse has been shown to be a positive environmental practice that is strongly encouraged by the United States Environmental Protection Agency (EPA) and many environmental groups. The vast majority of the PEIR's study and the Modified General Order's requirements are based in the sound, peer-reviewed science used to develop the EPA federal biosolids regulation. Specifically, the Modified General Order provides California with a stringent statewide regulation of biosolids land application that builds on the extensive scientific background used in the development of the federal biosolids regulations.

The Clean Water Act (CWA), enacted in 1972 and significantly amended in 1977 and 1987, directed EPA to promulgate regulations establishing limits on the types and amounts of pollutants that can be legally discharged from various industrial, commercial, and public dischargers of wastewater. The CWA required EPA to promulgate nationally applicable pretreatment standards, which restrict pollutant discharges from industries that indirectly discharge into waterbodies by discharging into

sewers. This pretreatment requirement has substantially improved the quality of the nation's biosolids. In 1993, EPA issued the Standards for the Use and Disposal of Sewage Sludge, otherwise known as the Part 503 Rule. The Part 503 Rule took nine years to develop and was premised on over 40 years of biosolids field research, including research performed in California. Provisions of the Modified General Order are based largely on this federal regulation to ensure California's regulation of biosolids incorporates the extensive health risk assessment and scientific review that went along with the development of the federal regulation.

The Modified General Order not only incorporates all of the Part 503 Rule requirements but also adds numerous requirements and restrictions that are more stringent than the federal regulations in order to protect conditions specific to California's unique environment. Several of the Modified General Order's requirements are policy-based, and are significantly more conservative than required by science. These policy-based requirements were developed and included in the Modified General Order to address perception concerns. The Modified General Order ultimately provides for uniform requirements for biosolids recycling in California that is both protective of public health and the environment.

CSD is providing the following information regarding our specific biosolids management situation for the Board's consideration. The CSD wastewater treatment facility currently produces and land applies 800 dry tons per year of Class B biosolids at sites in California and Arizona.

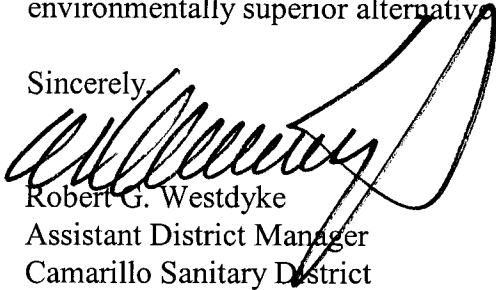
While never forgetting that our most important responsibility is to protect public health and the environment, wastewater treatment plant operators are also stewards of their ratepayers' fees. As such, CSD believes that compliance with the stringent Modified General Order requirements not only protects public health and the environment but also allows for the continued use of a cost-effective means to manage California's biosolids through the land application of Class B biosolids.

While the PEIR indicates that the overall impact of producing and land applying Class B biosolids is somewhat less than that associated with the production of Class A biosolids, CSD considers both to be environmentally sound biosolids management techniques and as such we support the availability of both options for biosolids management. The environmentally superior alternative identified in the PEIR as the Modified General Order does just that. The Modified General Order regulates the land application of biosolids, including both Class B and Class A materials, making both of these management options available to California's wastewater treatment agencies.

It is important to note that the land application of Class B biosolids remains the most widely used management option for biosolids in California, as well as in the United States. CASA believes that the preservation of the Class B land application option through the re-adoption of the Modified General Order is an integral aspect of a statewide program that encourages the beneficial use of biosolids. The land application of biosolids allows for the addition of valuable nutrients to the soil and conserves water supplies by increasing the water holding capacity of the soil. The safety of Class B biosolids is underscored by decades of scientific research, including two studies by the National Academy of Sciences, and biosolids are one of the most studied materials ever regulated by the United States Environmental Protection Agency.

In conclusion, CSD supports the continued beneficial use of biosolids in California via the re-adoption of the Modified General Order for the land application of biosolids, which includes both Class B and Class A materials. We urge the SWRCB to consider the findings of the January 2004 Revised Draft PEIR that identifies the Modified General Order as the environmentally superior alternative.

Sincerely,

A handwritten signature in black ink, appearing to read 'Robert G. Westdyke', is written over the typed name and title.

Robert G. Westdyke
Assistant District Manager
Camarillo Sanitary District

CC: Mr. Gary Carlton, SWRCB Board Member
Mr. Richard Katz, SWRCB Board Member
Mr. Peter Silva, SWRCB Board Member
Ms. Nancy Sutley, SWRCB Board Member



CENTRAL MARIN SANITATION AGENCY

Jason R. Dow, P.E.
General Manager

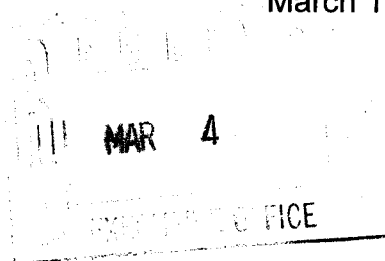
1301 Andersen Drive, San Rafael, CA 94901-5339

Telephone No. (415) 459-1455

Fax No. (415) 459-3971

March 1, 2004

Honorable Arthur G. Baggett Jr., Chair
California State Water Resources Control Board
1001 "I" Street
Sacramento, California 94815



Subject: **State Water Resources Control Board (SWRCB) Draft Revised
Statewide Program Environmental Impact Report (PEIR)
Covering General Waste Discharge Requirements for
Biosolids Land Application (January 2004)**

Dear Chairman Baggett and Members of the Board:

The Central Marin Sanitation Agency (CMSA) appreciates this opportunity to express its appreciation for the significant amount of time and effort the State Water Resources Control Board (SWRCB) staff has dedicated to the development of the Draft Revised Statewide Program EIR (PEIR) covering General Waste Discharge Requirements for Biosolids Land Application (Modified General Order). The PEIR along with the Modified General Order will allow for the continuance of a streamlined regulatory process for land applying biosolids in California. The re-adoption of the Modified General Order will allow CMSA to continue Class B biosolids land application in an environmentally safe manner and help with the diversion of waste from California's landfills.

CMSA is providing the following information regarding our specific biosolids management situation for the Board's consideration. We currently produce 1800 dry tons per year of Class B biosolids at our wastewater treatment facility in San Rafael. Approximately 40-45% of our biosolids are land applied during the spring and summer months at a land application site in southern Sonoma County.

While never forgetting that our most important responsibility is to protect public health and the environment, we are also stewards of their ratepayer's fees. As such, CMSA believes that compliance with the stringent Modified General Order requirements not only protects public health and the environment but also allows for the continued use of a cost-effective means to manage California's biosolids through the land application of Class B biosolids.

Our support of the conclusions set forth in the PEIR and the re-adoption of the Modified GO is based on the demonstrated benefits of biosolids reuse. Biosolids reuse has been shown to be a positive environmental practice that is strongly encouraged by the United States Environmental Protection Agency (EPA). The vast majority of the PEIR's study and the Modified General Order's requirements

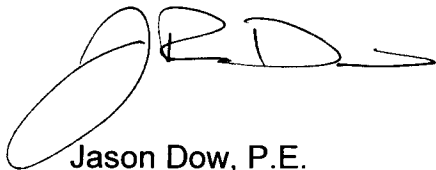


are based in the sound, peer-reviewed science used to develop the EPA federal biosolids regulation. The EPA federal biosolids regulation (Part 503 rule) took nine years to develop and was premised on over 40 years of biosolids field research, including research performed in California.

The Modified General Order not only incorporates all of the Part 503 Rule requirements but also adds numerous requirements and restrictions that are more stringent than the federal regulations in order to protect conditions specific to California's unique environment. Several of the Modified General Order's requirements are policy-based, and are significantly more conservative than required by science. The Modified General Order ultimately provides for uniform requirements for biosolids recycling in California that is both protective of public health and the environment

In conclusion, CMSA supports the continued beneficial use of biosolids in California via the re-adoption of the Modified General Order for the land application of biosolids. We urge the SWRCB to consider the findings of the January 2004 Revised Draft PEIR that identifies the Modified General Order as the environmentally superior alternative.

Sincerely,

A handwritten signature in black ink, appearing to read 'JD', with a large, loopy initial 'J' on the left.

Jason Dow, P.E.
General Manager
Central Marin Sanitation Agency

CITY OF LOS ANGELES

CALIFORNIA



JAMES K. HAHN
MAYOR

BOARD OF
PUBLIC WORKS

COMMISSIONERS

VALERIE LYNNE SHAW
PRESIDENT

ELLEN STEIN
VICE PRESIDENT

RONALD LOW
CYNTHIA M. RUIZ
JANICE WOOD

DEPARTMENT OF
PUBLIC WORKS

BUREAU OF SANITATION

RITA L. ROBINSON
DIRECTOR

RAYMOND J. KEARNEY
JAMES F. LANGLEY
JOSEPH E. MUNDINE
ENRIQUE C. ZALDIVAR
ASSISTANT DIRECTORS

433 SOUTH SPRING STREET
LOS ANGELES, CA 90013
TEL: (213) 473-7999
FAX: (213) 473-8100

March 15, 2004

Mr. Wayne Verrill
State Water Resources Control Board
Management Practices Support Unit
Division of Water Quality
P. O. Box 100
Sacramento, CA 95812

Dear Mr. Wayne Verrill:

**COMMENTS ON REVISED DRAFT STATEWIDE PROGRAM ENVIRONMENTAL
IMPACT REPORT COVERING GENERAL WASTE DISCHARGE REQUIREMENTS
FOR BIOSOLIDS LAND APPLICATION**

The City of Los Angeles, Bureau of Sanitation (Bureau) appreciates the opportunity to comment on the Draft Program Environmental Impact Report (EIR) covering General Waste Discharge Requirements for Biosolids Land Application. The Bureau currently produces 263,000 tons per year of biosolids at two of its wastewater treatment facilities. Ninety nine percent (99%) of the City's biosolids are land applied. Ninety three percent (93%) is Class A.

The EIR, along with the General Order (GO), will streamline the regulatory permitting process for land applying biosolids in California. Adoption of the GO will allow the Bureau to continue biosolids land application and reduce the burden on California's limited landfill capacity.

The Bureau supports the draft EIR and GO and requests that the State Water Resources Control Board (SWRCB) adopt the GO. The Bureau commends the SWRCB for continuing its efforts in revising the EIR to address the two alternatives: (1) Class A only; and (2) food crop limitation. The Bureau also supports a GO for the land application of biosolids that is protective of public health and the environment and appreciates the time spent by SWRCB staff in researching and analyzing the two alternatives. The SWRCB's analysis of the alternatives is based on sound science and the EIR has addressed the environmental impacts associated with each alternative.



Wayne Verrill
SWRCB
March 15, 2004
Page 2

The City produces Class A biosolids but supports the continued land application of Class B biosolids. Class B and Class A biosolids, when managed properly, provide environmental benefits to land. The GO, if adopted, would allow the use of either Class B or Class A biosolids, which is important when determining which biosolids management options are best for generators, appliers, and those using biosolids as a beneficial product.

The City supports the revised EIR and the SWRCB in adopting the GO.

If you have any questions please contact Diane Gilbert of my staff at (213) 473-8554.

Sincerely,



RITA L. ROBINSON, Director
Bureau of Sanitation

RLR:TJM:DXG

c: Dario Gomez, Mayor's Office
Rafael Prieto, Chief Legislative Analyst Office
Diane Gilbert
Warren Huang
Traci Minamide
RAD Central File/Biosolids Section

S A S M
SEWERAGE AGENCY OF
SOUTHERN MARIN

A Joint Powers Agency

- Almonte S.D.
- Alto S.D.
- City of Mill Valley
- Homestead Valley S.D.
- Richardson Bay S.D.
- Tamalpais C.S.D.

February 27, 2004

Honorable Arthur G. Baggett Jr., Chair
California State Water Resources Control Board
1001 "I" Street
Sacramento, California 94815

MAR 5

Subject: **State Water Resources Control Board (SWRCB) Draft Revised Statewide
Program Environmental Impact Report (PEIR) Covering General Waste
Discharge Requirements for Biosolids Land Application (January 2004)**

Dear Chairman Baggett and Members of the Board:

SASM is a small wastewater treatment agency in southern Marin County. We produce approximately 5 wet tons of class B sewage sludge each day. Half of this production is used as alternative daily cover at the local land fill and the other half is land applied in Sonoma County to grow oats for animal consumption.

If it happens that application standards are changed to allow land application of only Class A sludge, SASM would be required to abandon all land application and send all sludge to the landfill.

This seems a very sad outcome given the sound, peer-reviewed science used to develop the EPA federal biosolids regulation (Part 503 Rule) that led to the permitting of SASM's current successful land application operation. SASM notes that the Modified General Order not only incorporates all of the Part 503 Rule requirements but also adds numerous requirements and restrictions that are more stringent than the federal regulations in order to protect conditions specific to California's unique environment. Several of the Modified General Order's requirements are policy-based, and are significantly more conservative than required by science.

SASM therefore strongly supports the continued beneficial use of biosolids in California via the re-adoption of the Modified General Order for the land application of biosolids, which includes both Class B and Class A materials. We urge the SWRCB to consider the findings of the January 2004 Revised Draft PEIR that identifies the Modified General Order as the environmentally superior alternative.

Thank you for the opportunity to comment on this matter.

Sincerely,



David A. Coe
General Manager
Sewerage Agency of Southern Marin



"People Serving
People"

CITY OF RIVERSIDE

March 9, 2004

Honorable Arthur G. Baggett Jr., Chair
California State Water Resources Control Board
1001 "I" Street
Sacramento, California 94815

Subject: **State Water Resources Control Board (SWRCB) Draft Revised
Statewide Program Environmental Impact Report (PEIR) Covering
General Waste Discharge Requirements for Biosolids Land
Application (January 2004)**

Dear Chairman Baggett and Members of the Board:

The City of Riverside would like to take this opportunity to express its appreciation for the significant amount of time and effort the State Water Resources Control Board (SWRCB) staff has dedicated to the development of the Draft Revised Statewide Program EIR (PEIR) Covering General Waste Discharge Requirements for Biosolids Land Application (Modified General Order). The PEIR, along with the Modified General Order, will allow for the continuance of a streamlined regulatory process for land applying biosolids in California. The re-adoption of the Modified General Order will allow the City of Riverside to continue biosolids land application in an environmentally safe manner and help with the diversion of waste from California's landfills.

Biosolids reuse has been shown to be a positive environmental practice that is strongly encouraged by the United States Environmental Protection Agency (EPA) and many environmental groups. The vast majority of the PEIR's study and the Modified General Order's requirements are based in the sound, peer-reviewed science used to develop the EPA federal biosolids regulation. Specifically, the Modified General Order provides California with a stringent statewide regulation of biosolids land application that builds on the extensive scientific background used in the development of the federal biosolids regulations.

The Clean Water Act (CWA), enacted in 1972 and significantly amended in 1977 and 1987, directed EPA to promulgate regulations establishing limits on the types and amounts of pollutants that can be legally discharged from various industrial, commercial, and public dischargers of wastewater. The CWA required EPA to promulgate nationally

PUBLIC WORKS DEPARTMENT

3900 MAIN STREET • RIVERSIDE, CALIFORNIA 92522 • (909) 782-5341
FAX: (909)-782-5622

SEWERAGE SYSTEMS DIVISION • (909) 351-6140
5950 ACORN STREET • FAX: (909) 687-6978

applicable pretreatment standards, which restrict pollutant discharges from industries that indirectly discharge into waterbodies by discharging into sewers. This pretreatment requirement has substantially improved the quality of the nation's biosolids. In 1993, EPA issued the Standards for the Use and Disposal of Sewage Sludge, otherwise known as the Part 503 Rule. The Part 503 Rule took nine years to develop and was premised on over 40 years of biosolids field research, including research performed in California. Provisions of the Modified General Order are based largely on this federal regulation to ensure California's regulation of biosolids incorporates the extensive health risk assessment and scientific review that went along with the development of the federal regulation.

The Modified General Order not only incorporates all of the Part 503 Rule requirements but also adds numerous requirements and restrictions that are more stringent than the federal regulations in order to protect conditions specific to California's unique environment. Several of the Modified General Order's requirements are policy-based, and are significantly more conservative than required by science. These policy-based requirements were developed and included in the Modified General Order to address perception concerns. The Modified General Order ultimately provides for uniform requirements for biosolids recycling in California that is both protective of public health and the environment.

The City is providing the following information regarding our specific biosolids management situation for the Board's consideration. The City currently produces 7566 dry tons per year of Class B biosolids at its wastewater treatment facilities. All of our biosolids are presently land applied.

While never forgetting that our most important responsibility is to protect public health and the environment, wastewater treatment plant operators are also stewards of their ratepayers' fees. As such, the City of Riverside believes that compliance with the stringent Modified General Order requirements not only protects public health and the environment but also allows for the continued use of a cost-effective means to manage California's biosolids through the land application of Class B biosolids.

As a result of many of California's counties banning the land application of Class B biosolids, the City has performed research into the development of Class A biosolids technologies. The onerous siting and permitting requirements, in addition to increased energy consumption and tremendous capital expense, would result in increased costs of approximately \$823,000 per year to produce Class A biosolids with absolutely no corresponding environmental benefit. Currently, there is not nearly enough Class A biosolids processing capacity in California.

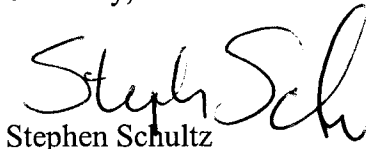
While the PEIR indicates that the overall impact of producing and land applying Class B biosolids is somewhat less than that associated with the production of Class A biosolids, the City considers both to be environmentally sound biosolids management techniques and as such we support the availability of both options for biosolids management. The environmentally superior alternative identified in the PEIR as the Modified General Order does just that. The Modified General Order regulates the land application of

biosolids, including both Class B and Class A materials, making both of these management options available to California's wastewater treatment agencies.

It is important to note that the land application of Class B biosolids remains the most widely used management option for biosolids in California, as well as in the United States. CASA believes that the preservation of the Class B land application option through the re-adoption of the Modified General Order is an integral aspect of a statewide program that encourages the beneficial use of biosolids. The land application of biosolids allows for the addition of valuable nutrients to the soil and conserves water supplies by increasing the water holding capacity of the soil. The safety of Class B biosolids is underscored by decades of scientific research, including two studies by the National Academy of Sciences, and biosolids are one of the most studied materials ever regulated by the United States Environmental Protection Agency.

In conclusion, the City of Riverside supports the continued beneficial use of biosolids in California via the re-adoption of the Modified General Order for the land application of biosolids, which includes both Class B and Class A materials. We urge the SWRCB to consider the findings of the January 2004 Revised Draft PEIR that identifies the Modified General Order as the environmentally superior alternative.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Schultz". The signature is fluid and cursive, with the first name "Stephen" and last name "Schultz" clearly distinguishable.

Stephen Schultz
Wastewater Systems Manager
Riverside Regional Water Quality Control Plant

CC: Mr. Gary Carlton, SWRCB Board Member
Mr. Richard Katz, SWRCB Board Member
Mr. Peter Silva, SWRCB Board Member
Ms. Nancy Sutley, SWRCB Board Member



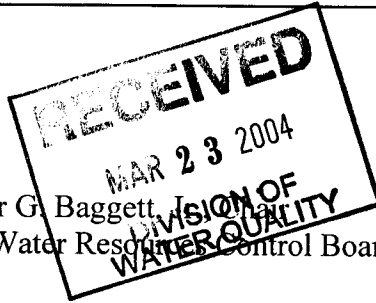
COUNTY of SONOMA
DEPARTMENT OF HEALTH SERVICES

L-17

Handwritten: J. J. Krug, DEAMB, with signature
Mark A. Kostielney - Director

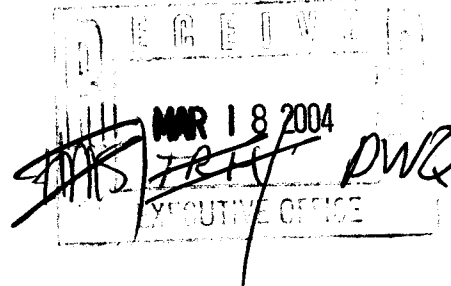
March 4, 2004

Honorable Arthur G. Baggett, Jr.
California State Water Resources Control Board
100 I Street
Sacramento, CA 94815



Handwritten: J. J. Krug, DEAMB, with signature
Environmental Health Division

Jonathan J. Krug - Director



Re: State Water Resources Control Board (SWRCB) Draft Revised Statewide Program
Environmental Impact Report (PEIR) Covering General Waste Discharge Requirements
for Biosolids Land Application (January 2004)

Dear Chairman Baggett and Members of the Board:

Sonoma County Department of Health Services, Environmental Health Division is the California Integrated Waste Management Board (CIWMB) certified Local Enforcement Agency (LEA) for solid waste management in Sonoma County. We would like to take this opportunity to comment on the Draft Revised Statewide Program Environmental Impact Report (PEIR) Covering General Waste Discharge Requirements for Biosolids Land Application. We support the conclusion that the Modified General Order (land application of Class B biosolids) is an environmentally superior alternative and urge the Board to re-adopt the Modified General Order so that the land application of Class B biosolids can continue in Sonoma County without significant modification to our established and successful program. We feel the parameters set forth in the Modified General Order are protective of public health and the environment and will continue to help with the diversion of waste from California's landfill.

The application of Class B biosolids on agricultural land has been underway in Sonoma County for more than 20 years with local oversight provided by this agency. The Sonoma County General Plan Policy PF-2q encourages the application of biosolids to agricultural lands if all of the following criteria are met:

1. The project's primary purpose is to enhance agricultural use.
2. The rate of biosolids application should not result in any future limitations on the potential agricultural use of the area of application.
3. The project shall be subject to the approval of the applicable Regional Water Quality Control Board.
4. A Use Permit shall be obtained.
5. A permit shall be obtained from the LEA.
6. The transportation, storage and application of biosolids to agricultural lands will not be detrimental to public health.
7. The project shall include provisions for periodic review and evaluation of long term impacts on soil, water, and agricultural production.

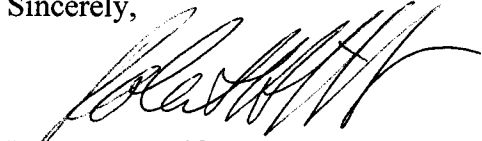
Sonoma County has benefited and continues to benefit from the practice of land application of biosolids through improved soil condition and improved crop yields. Our Biosolids Land Application Program includes the following requirements:

1. Biosolids stockpile area setbacks are 200 feet from property lines, public roads, inhabited dwellings, wells, creeks and San Pablo Bay and the Petaluma River and 100 feet from drainage ditches. Application area setbacks are 100 feet from inhabited dwellings, wells, creeks and San Pablo Bay and the Petaluma River and 50 feet from drainage ditches.
2. Annual Pre-Application Reports are required to be submitted by May 31 of each year. The Pre-Application Report shall contain the following information: a brief description of the land application site (Site Information); a tabular summary of the biosolids percent solids and 40CFR503 pollutant concentrations (metals and nitrogen); identification of the pathogen reduction alternative and vector attraction reduction option used to achieve Class B biosolids (including supporting documentation); Certification Statement signed by the generator; lab analyses report (dry weight basis) for volatile organic compounds, semi-volatile organic compounds, chlorinated pesticides and PCBs; representative sampling and analyses of soils PH (required range for soils/biosolids mixture 6.5 to 7.5); estimated daily/total tons of biosolids to be hauled; the proposed application rate and description of spreading procedures; the proposed crop type and harvest schedule and a description of the hauling route.
3. Annual Post-Application Reports are required to be submitted to this agency by February 19 of each year. The report shall contain the following information: a field summary report indicating the quantity of biosolids applied to each field, dates of application, applicable cumulative pollutant loading rates, types of crops grown and dates of planting and harvesting.
4. Monthly Reports summarizing the quantity of biosolids hauled to the site each day are due by the 30th day of the following month.
5. All biosolids hauling vehicles shall be permitted by this agency.
6. Written or verbal notification to the LEA is required at least 48 hours prior to biosolids spreading and discing.
7. Land application of biosolids is limited from May 1 to November 1 of each year, dependent upon dry weather conditions.
8. Wet weather stockpiling of biosolids from November 1 to May 1 requires the construction of storage areas approved by the RWQCB and the Sonoma County Permits and Resource Management Department.
9. Commingling of biosolids from separate sources is not allowed. Clearly identified and separate staging and land application areas are required for each generator of biosolids.
10. Soil from each field that has received biosolids shall be sampled and analyzed for the 40CFR503 metals, cation exchange capacity, PH, nitrogen and phosphorus every five years.
11. Failure to meet the above noted conditions may result in revocation of approval.

Because biosolids are one of the most studied materials ever regulated by the EPA, we believe that the land application of biosolids is an environmentally sound way to beneficially use this material in a manner that is also protective of public health. Acknowledging that the basis of the Modified General Order is in the Part 503 federal regulations it is our understanding that the Modified General Order contains provisions specific to protect conditions specific to California's unique environment.

Sonoma County Department of Health Services, Environmental Health Division supports the continued beneficial use of biosolids in California via the re-adoption of the Modified General Order. The Modified General Order provides a state basis for our land application General Plan Policy that is an important component to our program. Continuance of the Modified General Order via re-adoption in June, will allow us to continue a program that is of demonstrated importance and benefit to our agricultural community. We therefore urge the SWRCB to consider the findings of the January 2004 Revised Draft PEIR and re-adopt the Modified General order thereby continuing the beneficial practice of land application of Class B biosolids.

Sincerely,

A handwritten signature in black ink, appearing to read 'Robert A. Swift', with a stylized, flowing script.

Robert A. Swift, R.E.H..S.
Senior Environmental Health Specialist

c: Jeff Lewin, EH
 Mike Reynolds, City of Santa Rosa
 Ron Matheson, Vallejo Sanitation and Flood Control District
 Becky Gangnath, Synagro
 Marlaigne Hudnall, CASA

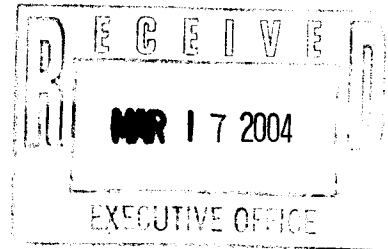


Delta Diablo Sanitation District

OFFICE AND TREATMENT PLANT: 2500 PITTSBURG-ANTIOCH HIGHWAY, ANTIOCH, CA 94509-1373

TEL.: (925) 756-1900 ADMIN. FAX: (925) 756-1961 MAINT. FAX: (925) 756-1963 OPER. FAX: (925) 756-1962 TECH. SVCS. FAX: (925) 756-1960
www.ddsd.org

March 12, 2004



Honorable Arthur G. Baggett Jr., Chair and Members
California State Water Resources Control Board
1001 "I" Street
Sacramento, CA 94815

Dear Chairman Baggett and Members of the Board:

**SUBJECT: DRAFT REVISED STATEWIDE PROGRAM ENVIRONMENTAL IMPACT
REPORT (PEIR) COVERING GENERAL WASTE DISCHARGE
REQUIREMENTS FOR BIOSOLIDS LAND APPLICATION
(FEBRUARY 2004)**

Delta Diablo Sanitation District appreciates the significant amount of time and effort invested by the State Water Resources Control Board (SWRCB) in the development of the Draft Revised Statewide Program Environmental Impact report (PEIR) and the Modified General Order (GO), which will allow for the continuance of a streamlined regulatory process for land applying biosolids in California. The re-adoption of the Modified GO will allow California agencies to continue Class B biosolids land application in an environmentally safe manner, and also help with the diversion of waste from California's landfills.

After landfilling biosolids during its first 10 years of operation, the District started recycling its biosolids in 1990. For the past 13 years, the District has contracted to land apply biosolids. The District supports continued land application of biosolids as a safe and environmentally beneficial practice. We support the conclusions set forth in the PEIR and the re-adoption of the Modified GO, based on the demonstrated benefits of biosolids reuse. Biosolids reuse has been shown to be a positive environmental practice that is strongly encouraged by the United States Environmental Protection Agency (EPA). The Modified GO not only incorporates all of the Federal regulations, but also adds numerous requirements and restrictions that are more stringent than the Federal regulations, in order to protect conditions specific to California's unique environment. The Modified GO ultimately provides for uniform requirements for biosolids recycling in California that are protective of public health and the environment.

We support the continued land application of Class B biosolids in California. We also recognize that it is important for California Publicly Owned Treatment Works (POTWs) to have multiple options available to them for alternative means of biosolids recycling or disposal. Management of Class A biosolids is also environmentally sound, albeit with slightly higher environmental impacts and slightly lower nutrient value than Class B biosolids, and thus we support the

Honorable Arthur G. Baggett Jr., Chair and Members

March 12, 2004

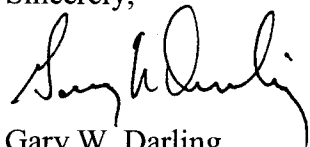
DRAFT REVISED STATEWIDE PROGRAM ENVIRONMENTAL IMPACT REPORT
(PEIR) COVERING GENERAL WASTE DISCHARGE REQUIREMENTS FOR BIOSOLIDS
LAND APPLICATION (FEBRUARY 2004)

Page 2

availability of both options for biosolids management. We believe that the Modified GO leaves both options available without placing unnecessary financial burdens on our ratepayers.

In conclusion, Delta Diablo Sanitation District supports the continued beneficial use of biosolids in California via the re-adoption of the Modified GO for the land application of biosolids, which includes both Class B and Class A materials. We urge the SWRCB to adopt the findings of the February 2004 Revised Draft PEIR that identifies the Modified GO as the environmentally superior alternative.

Sincerely,



Gary W. Darling
General Manager

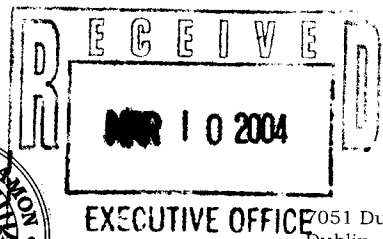
GGB/GWD:dcj

cc: Donald P. Freitas, DDSD Board Member
Federal D. Glover, DDSD Board Member
Aleida Rios, DDSD, Board Member
Gary Carlton, SWRCB Board Member
Richard Katz, SWRCB Board Member
Peter Silva, SWRCB Board Member
Nancy Sutley, SWRCB Board Member
District File
Chron File

**DUBLIN
SAN RAMON
SERVICES
DISTRICT**



L-19



7051 Dublin Boulevard
Dublin, California 94568
FAX: 925 829 1180

925 828 0515

March 1, 2004

Honorable Arthur G. Baggett Jr., Chair
California State Water Resources Control Board
1001 'T' Street
Sacramento, CA 94815

**Subject: State Water Resources Control Board Revised Draft Statewide Program
EIR Covering General Waste Discharge Requirements for Biosolids Land
Application**

Dear Chairman Baggett and Members of the Board:

Dublin San Ramon Services District (DSRSD) considers the land application of biosolids an important option for Publicly Owned Treatment Works (POTWs) in the State of California. DSRSD appreciates the effort spent by the SWRCB to develop the Draft Revised Statewide Program Environmental Impact Report (PEIR) covering this subject. Our District supports the conclusions presented in the PEIR that Land Application of Biosolids is a safe and valuable practice. We support the proposal to adopt a General Order that will incorporate the conclusions of the PEIR and allow the continued land application of Class B and Class A biosolids in the State of California for beneficial agricultural, silvicultural, horticultural and reclamation activities.

DSRSD is in the fortunate position of owning a Dedicated Land Disposal site for disposal of the District's biosolids residuals and will not be directly affected by the decision of the State Water Resources Control Board (SWRCB) on this particular matter. However, our District realizes that this question impacts the ability of POTWs across California to provide services to millions of citizens across the state. We support biosolids handling practices that have been shown to be careful of the health and safety of the state's citizens and beneficial to the environment.

We feel it is the obligation of sanitary agencies across the state not only to provide safe practices for disposing biosolids residuals, but also to provide those services in the most cost-effective means possible. Thus, we were very pleased to see the PEIR conclusion that land application of Class B biosolids was a preferred method for handling these materials.

DSRSD is committed to the idea of being a good environmental steward of the resources on which we have an impact. Our District has begun a program to exchange mercury thermometers to avoid contamination of the environment from improper disposal of mercury. We have begun a project to use 9 MGD of recycled water for irrigation of median strips and landscaping in order to reduce the demand for new sources of potable water. We have instituted a Biosolids Master Plan that is focused on finding a range of options to provide beneficial use of the District's biosolids residuals in the future. Therefore, our District policy of environmental stewardship includes

encouraging the beneficial reuse of biosolids and supporting state regulations that would authorize the land application of both Class B and Class A biosolids.

We urge the State Water Resources control Board to adopt the findings of the January 2004 Revised Draft Statewide Program EIR that identifies the Modified General Order as the environmentally superior alternative.

Sincerely,

A handwritten signature in black ink, appearing to read "Bert Michalczyk", with a stylized flourish at the end.

BERT L. MICHALCZYK
General Manager

SK:mb



DAVID R. WILLIAMS
DIRECTOR OF WASTEWATER

March 9, 2004

Honorable Arthur G. Baggett Jr., Chair and Members
California State Water Resources Control Board
1001 "I" Street
Sacramento, California 94815

Dear Chairman Baggett and Members of the Board:

Subject: Draft Revised Statewide Program Environmental Impact Report (PEIR) Covering
General Waste Discharge Requirements for Biosolids Land Application (February
2004)

East Bay Municipal Utility District (EBMUD) appreciates the opportunity to comment on the State Water Resources Control Board's (SWRCB) Draft Revised Statewide Program EIR (PEIR) Covering General Waste Discharge Requirements for Biosolids Land Application (Modified General Order). We would like to commend the SWRCB for their work on the PEIR. It is apparent that a significant amount of time and effort went into the development of this document.

EBMUD supports the re-adoption of the Modified General Order that would allow for the continued land application of Class B biosolids. The Modified General Order provides a clear and consistent regulatory process that is adequately protective of environmental resources, streamlines the permitting process for land application of biosolids, and includes policies and procedures that ensure continued refinement of biosolids reuse practices and protection of the environment. As demonstrated by the PEIR for the Modified General Order, the Modified General Order remains the environmentally superior alternative to the other alternatives analyzed. While the overall impact of producing and land applying Class B biosolids is somewhat less than that associated with the production of Class A biosolids, the Modified General Order regulates the land application of both Class B and Class A materials, making both of these management options available to California's wastewater treatment agencies. EBMUD considers both Class A and Class B biosolids to be environmentally sound biosolids management techniques and as such supports the availability of both options to California's wastewater treatment agencies.

EBMUD currently produces approximately 60,000 wet tons per year of Class B biosolids at our Main Wastewater Treatment Plant in Oakland, CA. For several years, 100% of our biosolids have been reused through either land application on non-food crop agriculture or through alternative daily cover at landfills. EBMUD's policy for biosolids management promotes the beneficial and cost-effective reuse of biosolids, in accordance with the EBMUD's mission statement, which includes a commitment to environmental responsibility.

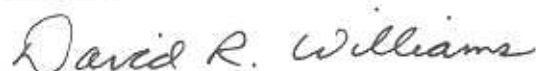
The land application of biosolids allows for the addition of valuable nutrients to the soil and conserves water supplies by increasing the water holding capacity of the soil. The safety of Class B biosolids is underscored by decades of scientific research, including two studies by the National Academy of Sciences. In fact, biosolids are one of the most studied materials ever regulated by the United States Environmental Protection Agency (EPA).

EBMUD is developing a long-range biosolids master plan. The master plan has considered the implementation of a number of Class A technologies to produce Class A biosolids. Based on the work done for the master plan, depending on the alternative selected, a capital investment of up to \$60 million will be needed to produce a Class A product, with additional Operating and Maintenance costs of up to \$4 million per year. As noted in the PEIR, production of a Class A product actually has less environmental benefit than production of a Class B product, including reduced nutrient value, and increased consumption of energy and possibly air emissions.

EBMUD places a very high priority on protection of public health and the environment and balances that with wise use of the fees we collect from our ratepayers. As such, EBMUD believes that our ability to continue to land apply Class B biosolids in compliance with the Modified General Order requirements not only protects public health and the environment but also allows for the continued use of a cost-effective means to manage California's biosolids through the land application of Class B biosolids – returning to the earth those nutrients that we previously extracted. The farmers who use our biosolids appreciate the material's ability to improve their soils thereby increasing the crop yields from their fields.

In conclusion, EBMUD supports the continued beneficial use of biosolids in California via the re-adoption of the Modified General Order for the land application of biosolids, which includes both Class B and Class A materials. We urge the SWRCB to certify the findings of the Revised 2004 Revised Draft PEIR that identifies the Modified General Order as the environmentally superior alternative.

Sincerely,



DAVID R. WILLIAMS
Director of Wastewater

DRW:MAB:kl

cc: Peter S. Silva, SWRCB Board Member
Richard Katz, SWRCB Board Member
Gary Carlton, SWRCB Board Member
Nancy Sutley, SWRCB Board Member
Celeste Cantu, Executive Director, SWRCB



P.O. Box 3000
31315 Chaney Street
Lake Elsinore, CA 92531-3000
(909) 674-3146
Fax: (909) 674-9872

February 27, 2004

Honorable Arthur G. Baggett Jr., Chair
California State Water Resources Control Board
1001 "I" Street
Sacramento, California 94815

**Subject: State Water Resources Control Board (SWRCB) Draft Revised
Statewide Program Environmental Impact Report (PEIR) Covering
General Waste Discharge Requirements for Biosolids Land
Application (January 2004)**

Dear Chairman Baggett and Members of the Board:

Elsinore Valley Municipal Water District appreciates this opportunity to express its appreciation for the significant amount of time and effort the State Water Resources Control Board (SWRCB) staff has dedicated to the development of the Draft Revised Statewide Program EIR (PEIR) Covering General Waste Discharge Requirements for Biosolids Land Application (Modified General Order). The PEIR along with the Modified General Order will allow for the continuance of a streamlined regulatory process for land applying biosolids in California. The re-adoption of the Modified General Order will allow the Elsinore Valley Municipal Water District to exercise its option land apply Class B biosolids in an environmentally safe manner and help with the diversion of waste from California's landfills.

While never forgetting that our most important responsibility is to protect public health and the environment, wastewater treatment plant operators are also stewards of their ratepayer's fees. As such, Elsinore Valley Municipal Water District believes that compliance with the stringent Modified General Order requirements not only protects public health and the environment but also allows for the continued use of a cost-effective means to manage California's biosolids through the land application of Class B biosolids.

Our support of the conclusions set forth in the PEIR and the re-adoption of the Modified GO is based on the demonstrated benefits of biosolids reuse. Biosolids reuse has been shown to be a positive environmental practice that is strongly encouraged by the United States Environmental Protection Agency (EPA). The vast majority of the PEIR's study and the Modified General Order's requirements are based in the sound, peer-reviewed science used to develop the EPA federal biosolids regulation. The EPA federal biosolids regulation (Part 503 rule) took nine years to develop and was premised on over 40 years of biosolids field research, including research performed in California.

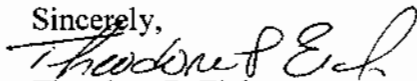
The Modified General Order not only incorporates all of the Part 503 Rule requirements but also adds numerous requirements and restrictions that are more stringent than the federal regulations in order to protect conditions specific to California's unique environment. Several of the Modified General Order's requirements are policy-based, and are significantly more conservative than required by science.

The Modified General Order ultimately provides for uniform requirements for biosolids recycling in California that is both protective of public health and the environment

While we support the continued land application of Class B biosolids in California, we acknowledge that the management of Class A biosolids is also an environmentally sound (albeit with higher impacts than Class B) management option and thus we support the availability of both options for biosolids management. We feel the Modified GO leaves both options available without placing unnecessary financial burdens on our ratepayers.

In conclusion, Elsinore Valley Municipal Water District supports the continued beneficial use of biosolids in California via the re-adoption of the Modified General Order for the land application of biosolids, which includes both Class B and Class A materials. We urge the SWRCB to consider the findings of the January 2004 Revised Draft PEIR that identifies the Modified General Order as the environmentally superior alternative.

Sincerely,



Theodore P. Eich

Wastewater Operations Manager

Elsinore Valley Municipal Water District



ENCINA WASTEWATER AUTHORITY

A Public Agency

6200 Avenida Encinas
Carlsbad, CA 92009-1095
Telephone (760) 438-3941
FAX (760) 438-3861 (Plant)
(760) 431-7493 (Admin)

March 1, 2004

Ref: Admin.04-7458

Honorable Arthur G. Baggett Jr., Chair
California State Water Resources Control Board
1001 "I" Street
Sacramento, California 94815

SUBJECT: State Water Resources Control Board (SWRCB) Draft Revised Statewide Program Environmental Impact Report (PEIR) Covering General Waste Discharge Requirements for Biosolids Land Application (January 2004)

Dear Chairman Baggett and Members of the Board:

The Encina Wastewater Authority (EWA) appreciates this opportunity to express its appreciation for the significant amount of time and effort the State Water Resources Control Board (SWRCB) staff has dedicated to the development of the Draft Revised Statewide Program EIR (PEIR) Covering General Waste Discharge Requirements for Biosolids Land Application (Modified General Order). The PEIR along with the Modified General Order will allow for the continuance of a streamlined regulatory process for land applying biosolids in California. The re-adoption of the Modified General Order will allow the EWA to continue Class B biosolids land application in an environmentally safe manner and help with the diversion of waste from California's landfills.

EWA is providing the following information regarding our specific biosolids management situation for the Board's consideration. The EWA currently produces 6,000 dry tons per year of Class B biosolids at its wastewater treatment facilities. Our biosolids are managed as follows: 100 percent of the biosolids are land applied.

While never forgetting that our most important responsibility is to protect public health and the environment, wastewater treatment plant operators are also stewards of their ratepayer's fees. As such, EWA believes that compliance with the stringent Modified General Order requirements not only protects public health and the environment but also allows for the continued use of a cost-effective means to manage California's biosolids through the land application of Class B biosolids.

As a result of many of California's counties banning the land application of Class B biosolids, EWA developed a Biosolids Management Strategic Plan (Plan) in 2002. The Plan recommended that EWA construct a heat drying system to achieve Class A biosolids. The capital cost of the heat drying system is estimated to be \$28 million. Although EWA intends to produce Class A biosolids in the future, it is important that Class B land application options remain viable as backup to when our heat drying system is off-line and EWA is producing Class B biosolids.

Our support of the conclusions set forth in the PEIR and the re-adoption of the Modified GO is based on the demonstrated benefits of biosolids reuse. Biosolids reuse has been shown to be a positive environmental practice that is strongly encouraged by the United States Environmental Protection Agency (EPA). The vast majority of the PEIR's study and the Modified General Order's requirements are based in the sound, peer-reviewed science used to develop the EPA federal biosolids regulation. The EPA federal biosolids regulation (Part 503 rule) took nine years to develop and was premised on over 40 years of biosolids field research, including research performed in California.

The Modified General Order not only incorporates all of the Part 503 Rule requirements but also adds numerous requirements and restrictions that are more stringent than the federal regulations in order to protect conditions specific to California's unique environment. Several of the Modified General Order's requirements are policy-based, and are significantly more conservative than required by science. The Modified General Order ultimately provides for uniform requirements for biosolids recycling in California that is both protective of public health and the environment

While we support the continued land application of Class B biosolids in California, we acknowledge that the management of Class A biosolids is also an environmentally sound management option and thus we support the availability of both options for biosolids management. We feel the Modified GO leaves both options available without placing unnecessary financial burdens on our ratepayers.

In conclusion, EWA supports the continued beneficial use of biosolids in California via the re-adoption of the Modified General Order for the land application of biosolids, which includes both Class B and Class A materials. We urge the SWRCB to consider the findings of the January 2004 Revised Draft PEIR that identifies the Modified General Order as the environmentally superior alternative.

Sincerely,


Michael T. Hogan
General Manager
Encina Wastewater Authority

MTH:am



Serving North
San Diego County

ENCINA WASTEWATER AUTHORITY

6200 Avenida Encinas • Carlsbad, CA 92009-1095 • Telephone (760) 438-3941

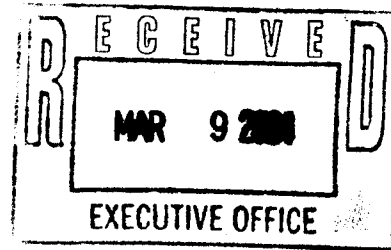
Plant Fax (760) 438-3861 • Administrative Offices Fax (760) 431-7493



Printed on
Recycled Paper



L-23



Fairfield-Suisun Sewer District

Richard F. Luthy, Jr.
General Manager/District Engineer

March 5, 2004

BI-120.40/04

Honorable Arthur G. Baggett Jr., Chair
California State Water Resources Control Board
1001 "I" Street
Sacramento, CA 94815

Subject: State Water Resources Control Board (SWRCB) Draft Revised Statewide Program Environmental Impact Report (PEIR) Covering General Waste Discharge Requirements for Biosolids Land Application (January 2004)

Dear Chairman Baggett and Members of the Board:

The Fairfield-Suisun Sewer District (FSSD) appreciates this opportunity to express its appreciation for the significant amount of time and effort the State Water Resources Control Board (SWRCB) staff has dedicated to the development of the Draft Revised Statewide Program EIR (PEIR) Covering General Waste Discharge Requirements for Biosolids Land Application (Modified General Order). The PEIR along with the Modified General Order will allow for the continuance of a streamlined regulatory process for land applying biosolids in California. The re-adoption of the Modified General Order will insure that agencies such as ours will be able to continue Class B biosolids land application in an environmentally safe manner and help with the diversion of waste from California's landfills.

While never forgetting that our most important responsibility is to protect public health and the environment, wastewater treatment plant operators are also stewards of their rate payers' fees. We believe that compliance with the stringent Modified General Order requirements not only protects public health and the environment but also allows for the continued use of a cost-effective means to manage California's biosolids through the land application of Class B biosolids.

Our support of the conclusions set forth in the PEIR and the re-adoption of the Modified GO is based on the demonstrated benefits of biosolids reuse. Biosolids reuse has been shown to be a positive environmental practice that is strongly encouraged by the United States Environmental Protection Agency (EPA). The vast majority of the PEIR's study and the Modified General Order's requirements are based in the sound, peer-reviewed science used to develop the EPA federal biosolids regulation. The EPA federal biosolids regulation (Part 503 rule) took nine years to develop and was premised on over 40 years of biosolids field research, including research performed in California.

Address:
1010 Chadbourne Rd
Fairfield, CA 94534-9700
Telephone:
(707) 429-8830
Fax (707) 429-1280



March 5, 2004

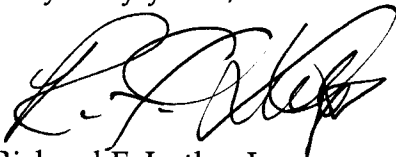
Page 2

The Modified General Order not only incorporates all of the Part 503 Rule requirements but also adds numerous requirements and restrictions that are more stringent than the federal regulations in order to protect conditions specific to California's unique environment. Several of the Modified General Order's requirements are policy-based, and are significantly more conservative than required by science. The Modified General Order ultimately provides for uniform requirements for biosolids recycling in California that is both protective of public health and the environment.

While we support the continued land application of Class B biosolids in California, we acknowledge that the management of Class A biosolids is also an environmentally sound (albeit with slightly higher impacts than Class B) management option and thus we support the availability of both options for biosolids management. We feel the Modified GO leaves both options available without placing unnecessary financial burdens on our rate payers.

We support the continued beneficial use of biosolids in California via the re-adoption of the Modified General Order for the land application of biosolids, which includes both Class B and Class A materials. We urge the SWRCB to adopt the findings of the January 2004 Revised Draft PEIR that identifies the Modified General Order as the environmentally superior alternative.

Very truly yours,

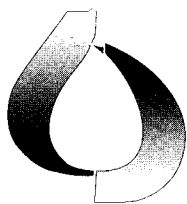


Richard F. Luthy, Jr.
General Manager/District Engineer

/cb

cc: Marlaigne Hudnall, CASA





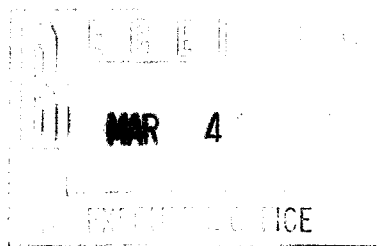
Inland Empire

UTILITIES AGENCY*

6075 Kimball Avenue • Chino, CA 91710
P.O. Box 9020 • Chino Hills, CA 91709
TEL (909) 993-1600 • FAX (909) 597-8875
www.ieua.org
* A Municipal Water District

March 1, 2004

Honorable Arthur G. Baggett Jr., Chair
California State Water Resources Control Board
1001 "T" Street
Sacramento, CA 94815



Subject: **State Water Resources Control Board (SWRCB) Draft Revised Statewide Program Environmental Impact Report (PEIR) Covering General Waste Discharge Requirements for Biosolids Land Application (January 2004)**

Dear Chairman Baggett and Members of the Board:

The Inland Empire Utilities Agency (IEUA) appreciates the opportunity to comment and provide support for the Draft Revised Statewide Program EIR (PEIR) Covering General Waste Discharge Requirements for Biosolids Land Application (Modified General Order). The PEIR along with the Modified General Order will allow for the continuance of a streamlined regulatory process for recycling biosolids to a variety of agricultural uses in California. The re-adoption of the Modified General Order will allow the IEUA to continue to recycle biosolids in an environmentally safe manner while also diverting a valuable resource from California's landfills. Therefore, IEUA supports the adoption of the Modified General Order in its present form (January 2004).

Biosolids recycling is a demonstrated and positive environmental practice that is strongly encouraged by the US EPA and many environmental groups. Based on our review, it appears that the vast majority of the PEIR's study and the Modified General Order's requirements are based in the sound, peer-reviewed science used to develop the EPA federal biosolids regulation. Specifically, the Modified General Order provides California, with stringent statewide regulation of biosolids recycling to farm land, building on the extensive scientific background used in the development of the federal biosolids regulations.

The Modified General Order appropriately incorporates all of the Part 503 Rule requirements and adds numerous requirements and restrictions that are more stringent than the federal regulations in order to protect conditions specific to California's unique environment. While several of the Modified General Order's requirements are policy-based, and are significantly more conservative than required by science, these policy-based requirements were developed and included in the Modified General Order to address perception concerns. The Modified General Order ultimately provides for uniform requirements for biosolids recycling in California that is both protective of public health and the environment.

IEUA's mission specifically incorporates our most important responsibility of protecting public health and the environment. As we are also stewards of our ratepayers fees, we believe that compliance with the Modified General Order requirements not only protects public health and the environment but also allows for the continued use of a cost-effective means to recycle a valuable resource. While the PEIR indicates that the overall impact of producing and land applying Class B biosolids is somewhat less than that associated with the production of Class A biosolids, IEUA considers both the recycling of either Class A or Class B biosolids to be environmentally sound biosolids recycling methods. We appreciate that the Modified General Order regulates the land application of biosolids, including both Class B and Class A materials, making both of these management options available to IEUA.

It is clear that a significant amount of time and effort has been dedicated to the development of the PIER and Modified General Order by the SWRCB staff and we would like to express our appreciation. In conclusion, IEUA supports the continued beneficial recycling of biosolids in California via the re-adoption of the Modified General Order for the land application of biosolids, which includes both Class B and Class A materials. We urge the SWRCB to consider the findings of the January 2004 Revised Draft PEIR that identifies the Modified General Order as the environmentally superior alternative.

Sincerely,
INLAND EMPIRE UTILITIES AGENCY



Richard W. Atwater
Chief Executive Officer
General Manager

c.c. Mr. Gary Carlton, SWRCB Board Member
Mr. Richard Katz, SWRCB Board Member
Mr. Peter Silva, SWRCB Board Member
Ms. Nancy Sutley, SWRCB Board Member
IEUA Board of Directors

March 15, 2004

Honorable Arthur G. Baggett Jr., Chair
California State Water Resources Control Board
1001 "I" Street
Sacramento, California 94815

Subject: **State Water Resources Control Board (SWRCB) Draft Revised
Statewide Program Environmental Impact Report (PEIR) Covering
General Waste Discharge Requirements for Biosolids Land
Application (January 2004)**

Dear Chairman Baggett and Members of the Board:

Las Virgenes Municipal Water District (LVMWD) would like to take this opportunity to express its appreciation for the significant amount of time and effort the State Water Resources Control Board (SWRCB) staff has dedicated to the development of the Draft Revised Statewide Program EIR (PEIR) Covering General Waste Discharge Requirements for Biosolids Land Application (Modified General Order). The PEIR, along with the Modified General Order, will allow for the continuance of a streamlined regulatory process for land applying biosolids in California. The re-adoption of the Modified General Order will allow the LVMWD to continue biosolids land application in an environmentally safe manner and help with the diversion of waste from California's landfills.

Biosolids reuse has been shown to be a positive environmental practice that is strongly encouraged by the United States Environmental Protection Agency (EPA) and many environmental groups. The vast majority of the PEIR's study and the Modified General Order's requirements are based in the sound, peer-reviewed science used to develop the EPA federal biosolids regulation. Specifically, the Modified General Order provides California with a stringent statewide regulation of biosolids land application that builds on the extensive scientific background used in the development of the federal biosolids regulations.

The Clean Water Act (CWA), enacted in 1972 and significantly amended in 1977 and 1987, directed EPA to promulgate regulations establishing limits on the types and amounts of pollutants that can be legally discharged from various industrial, commercial, and public dischargers of wastewater. The CWA required EPA to promulgate nationally applicable pretreatment standards, which restrict pollutant discharges from industries that indirectly discharge into waterbodies by discharging into sewers. This pretreatment requirement has substantially improved the quality of the nation's biosolids. In 1993, EPA issued the Standards for the Use and Disposal of Sewage Sludge, otherwise known as the Part 503 Rule. The Part 503 Rule took nine years to develop and was premised on over 40 years of biosolids field research, including research performed in California. Provisions of the Modified General Order are based largely on this federal regulation to ensure California's regulation of biosolids incorporates the extensive health risk

assessment and scientific review that went along with the development of the federal regulation.

The Modified General Order not only incorporates all of the Part 503 Rule requirements but also adds numerous requirements and restrictions that are more stringent than the federal regulations in order to protect conditions specific to California's unique environment. Several of the Modified General Order's requirements are policy-based, and are significantly more conservative than required by science. These policy-based requirements were developed and included in the Modified General Order to address perception concerns. The Modified General Order ultimately provides for uniform requirements for biosolids recycling in California that is both protective of public health and the environment.

LVMWD is providing the following information regarding our specific biosolids management situation for the Board's consideration. LVMWD currently produces 3,651 dry tons per year of biosolids at its wastewater treatment facilities. Unlike most of the POTW's in California, all of our biosolids are locally processed and beneficially reused. The vast majority of our biosolids are digested to meet Class B, and then composted to meet Class A requirements. The Composting Facility operations began in 1993 after it became apparent that our dedicated land application farm would not be sufficient to handle the biosolids produced in our area. However the land application program continues to be an essential back up system for biosolids handling. Land application of Class B biosolids is still used when portions of the facility are taken off line for service. This dedicated farm area currently exists under an established WDR permit and this GO, within an Environmentally Sensitive Area.

While never forgetting that our most important responsibility is to protect public health and the environment, wastewater treatment plant operators are also stewards of their ratepayers' fees. As such, LVMWD believes that compliance with the stringent Modified General Order requirements not only protects public health and the environment but also allows for the continued use of a cost-effective means to manage California's biosolids through the land application of Class B biosolids.

While the PEIR indicates that the overall impact of producing and land applying Class B biosolids is somewhat less than that associated with the production of Class A biosolids, LVMWD considers both to be environmentally sound biosolids management techniques and as such we support the availability of both options for biosolids management. The environmentally superior alternative identified in the PEIR as the Modified General Order does just that. The Modified General Order regulates the land application of biosolids, including both Class B and Class A materials, making both of these management options available to California's wastewater treatment agencies.

It is important to note that the land application of Class B biosolids remains the most widely used management option for biosolids in California, as well as in the United States. CASA believes that the preservation of the Class B land application option through the re-adoption of the Modified General Order is an integral aspect of a statewide

program that encourages the beneficial use of biosolids. The land application of biosolids allows for the addition of valuable nutrients to the soil and conserves water supplies by increasing the water holding capacity of the soil. The safety of Class B biosolids is underscored by decades of scientific research, including two studies by the National Academy of Sciences, and biosolids are one of the most studied materials ever regulated by the United States Environmental Protection Agency. The change in nomenclature to describe biosolids reuse as recycled and beneficial, rather than disposal is timely and welcomed by this industry.

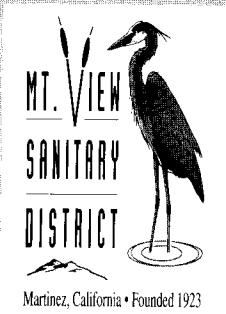
In conclusion, LVMWD supports the continued beneficial use of biosolids in California via the re-adoption of the Modified General Order for the land application of biosolids, which includes both Class B and Class A materials. We urge the SWRCB to consider the findings of the January 2004 Revised Draft PEIR that identifies the Modified General Order as the environmentally superior alternative.

Sincerely,

A handwritten signature in black ink, reading "David R. Lippman". The signature is fluid and cursive, with the first name "David" being particularly prominent.

David R. Lippman
Interim Director of Facilities & Operations Department
Las Virgenes Municipal Water District

CC: Mr. Gary Carlton, SWRCB Board Member
Mr. Richard Katz, SWRCB Board Member
Mr. Peter Silva, SWRCB Board Member
Ms. Nancy Sutley, SWRCB Board Member



BOARD OF DIRECTORS

Stanley R. Caldwell

Arthur J. Castro

David P. Maggi

Gregory T. Pyka

Dorothy M. Sakazaki

David R. Contreras

DISTRICT MANAGER

Sheri L. Riddle

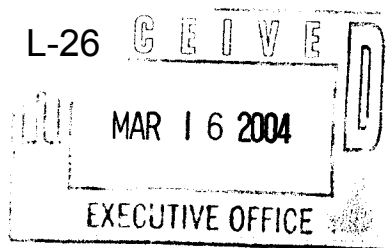
BOARD SECRETARY

Maurice E. Huguet, Jr.

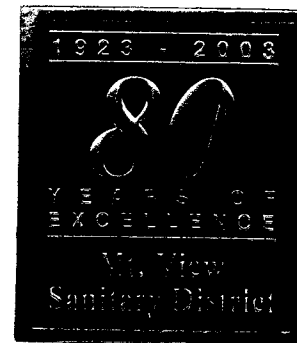
ATTORNEY

Randolph W. Leptien

ENGINEER



March 11, 2004



Honorable Arthur G. Baggett Jr., Chair and Members
California State Water Resources Control Board
1001 "I" Street
Sacramento, CA 94815

Dear Chairman Baggett and Members of the Board:

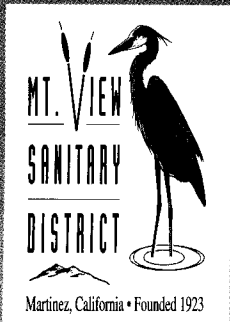
Subject: Draft Revised Statewide Program Environmental Impact Report (PEIR) Covering General Waste Discharge Requirements for Biosolids Land Application (February 2004)

Mt. View Sanitary District appreciates the significant amount of time and effort invested by the State Water Resources Control Board in the development of the Draft Revised Statewide Program EIR (PEIR) and the Modified General Order, which will allow for the continuance of a streamlined regulatory process for land applying biosolids in California. The re-adoption of the Modified General Order will allow California agencies to continue Class B biosolids land application in an environmentally safe manner, and also help with the diversion of waste from California's landfills.

Mt. View Sanitary District has been recycling biosolids since the 1980's and supports continued land application of biosolids as a safe and environmentally beneficial practice. We support the conclusions set forth in the PEIR and the re-adoption of the Modified GO, based on the demonstrated benefits of biosolids reuse. Biosolids reuse has been shown to be a positive environmental practice that is strongly encouraged by the United States Environmental Protection Agency (EPA). The Modified General Order not only incorporates all of the Federal regulations, but also adds numerous requirements and restrictions that are more stringent than the federal regulations in order to protect conditions specific to California's unique environment. The Modified General Order ultimately provides for uniform requirements for biosolids recycling in California that is both protective of public health and the environment.

We support the continued land application of Class B biosolids in California. We also recognize that it is important for California POTWs to have multiple options available to them for alternative means of biosolids recycling or disposal. Management of Class A biosolids is

Mt. View Sanitary District
3800 ARTHUR ROAD
P.O. BOX 2757
MARTINEZ, CA 94553
925-228-5635
FAX: 925-228-7585



Honorable Arthur G. Baggett, Jr.

March 11, 2004

Page 2

also an environmentally sound (albeit with slightly higher environmental impacts and slightly lower nutrient value than that Class B management option and thus we support the availability of both options for biosolids management. We believe that the Modified GO leaves both options available without placing unnecessary financial burdens on our ratepayers.

In conclusion, Mt. View Sanitary District supports the continued beneficial use of biosolids in California via the re-adoption of the Modified General Order for the land application of biosolids, which includes both Class B and Class A materials. We urge the SWRCB to adopt the findings of the February 2004 Revised Draft PEIR that identifies the Modified General Order as the environmentally superior alternative.

Thank you.

Sincerely,

David R. Contreras
District Manager

cc: Mr. Gary Carlton, SWRCB Board Member
Mr. Richard Katz, SWRCB Board Member
Mr. Peter Silva, SWRCB Board Member
Ms. Nancy Sutley, SWRCB Board Member

NORTH OF RIVER SANITARY DISTRICT NO. 1

**204 UNIVERSE AVENUE
BAKERSFIELD, CA 93308**

DIRECTORS

RICHARD L. KYKER-PRESIDENT
DONALD SILVIUS-VICE PRESIDENT
SAMUEL SCOLES
GARY McKIBBIN
DEAN MARSHALL

SECRETARY-MANAGER

DONALD O. GLOVER
204 UNIVERSE AVENUE
PHONE (661) 399-6411
FAX (661) 399-2856
EMAIL norsd@igalaxy.net

March 1, 2004

Honorable Arthur G. Baggett Jr., Chair
California State Water Resources Control Board
1001 "I" Street
Sacramento, California 94815

Subject: **State Water Resources Control Board (SWRCB) Draft Revised
Statewide Program Environmental Impact Report (PEIR) Covering
General Waste Discharge Requirements for Biosolids Land
Application (January 2004)**

Dear Chairman Baggett and Members of the Board:

North of River Sanitary District appreciates this opportunity to express its appreciation for the significant amount of time and effort the State Water Resources Control Board (SWRCB) staff has dedicated to the development of the Draft Revised Statewide Program EIR (PEIR) Covering General Waste Discharge Requirements for Biosolids Land Application (Modified General Order). The PEIR along with the Modified General Order will allow for the continuance of a streamlined regulatory process for land applying biosolids in California. The re-adoption of the Modified General Order will allow the North of River Sanitary District to continue Class B biosolids land application in an environmentally safe manner and help with the diversion of waste from California's landfills.

North of River Sanitary District is providing the following information regarding our specific biosolids management situation for the Board's consideration. The North of River Sanitary District currently produces 300 dry tons per year of Class B biosolids at its wastewater treatment facilities. Our biosolids are managed as follows: 100% of the biosolids are land applied.

While never forgetting that our most important responsibility is to protect public health and the environment, wastewater treatment plant operators are also stewards of their ratepayers fees. The North of River Sanitary District serves a lower income population of 40,000 people. As such, North of River Sanitary District believes that compliance with the stringent Modified General Order requirements not only protects public health and the environment but also allows for the continued use of a cost-effective means to manage California's biosolids through the land application of Class B biosolids.

As a result of many of California's counties banning the land application of Class B biosolids, North of River Sanitary District has performed research into the development of Class A biosolids technologies. The onerous siting and permitting requirements in addition to increased energy consumption and tremendous capital expense would result in approximately 10 to 15% of North of River Sanitary District's operating budget to produce Class A biosolids with absolutely no corresponding environmental benefit. This is a minimum amount and would be hard to pass on to the ratepayers.

Our support of the conclusions set forth in the PEIR and the re-adoption of the Modified GO is based on the demonstrated benefits of biosolids reuse. Biosolids reuse has been shown to be a positive environmental practice that is strongly encouraged by the United States Environmental Protection Agency (EPA). The vast majority of the PEIR's study and the Modified General Order's requirements are based in the sound, peer-reviewed science used to develop the EPA federal biosolids regulation. The EPA federal biosolids regulation (Part 503 rule) took nine years to develop and was premised on over 40 years of biosolids field research, including research performed in California.

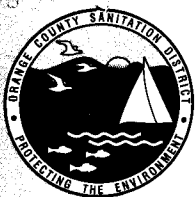
The Modified General Order not only incorporates all of the Part 503 Rule requirements but also adds numerous requirements and restrictions that are more stringent than the federal regulations in order to protect conditions specific to California's unique environment. Several of the Modified General Order's requirements are policy-based, and are significantly more conservative than required by science. The Modified General Order ultimately provides for uniform requirements for biosolids recycling in California that is both protective of public health and the environment

While we support the continued land application of Class B biosolids in California, we acknowledge that the management of Class A biosolids is also an environmentally sound (albeit with slightly higher impacts than Class B) management option and thus we support the availability of both options for biosolids management. We feel the Modified GO leaves both options available without placing unnecessary financial burdens on our ratepayers.

In conclusion, North of River Sanitary District supports the continued beneficial use of biosolids in California via the re-adoption of the Modified General Order for the land application of biosolids, which includes both Class B and Class A materials. We urge the SWRCB to consider the findings of the January 2004 Revised Draft PEIR that identifies the Modified General Order as the environmentally superior alternative.

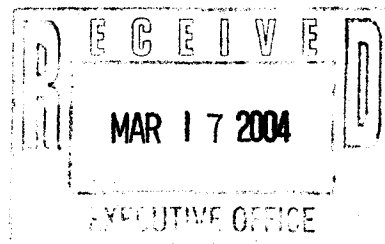
Sincerely,

Donald O. Glover
North of River Sanitary District



ORANGE COUNTY SANITATION DISTRICT

L-28



March 15, 2004

phone:
(714) 962-2411

fax:
(714) 962-0356
www.ocsd.com

mailing address:
P.O. Box 8127
Fountain Valley, CA
92728-8127

street address:
10844 Ellis Avenue
Fountain Valley, CA
92708-7018

Honorable Arthur G. Baggett Jr.
California State Water Resources Control Board
1001 "I" Street
Sacramento, California 94815

SUBJECT: State Water Resources Control Board Draft Revised Statewide Program Environmental Impact Report Covering General Waste Discharge Requirements for Biosolids Land Application - January 2004

Member Agencies

Cities

Anaheim
Brea
Buena Park
Cypress
Fountain Valley
Fullerton
Garden Grove
Huntington Beach
Irvine
La Habra
La Palma
Los Alamitos
Newport Beach
Orange
Placentia
Santa Ana
Seal Beach
Stanton
Tustin
Villa Park
Yorba Linda

County of Orange

Sanitary Districts

Costa Mesa
Midway City

Water Districts

Irvine Ranch

The Orange County Sanitation District (OCSD) appreciates this opportunity to commend the State Water Resources Control Board (SWRCB) staff for the significant amount of time and effort they have dedicated to the development of a reasonable Draft Revised Statewide Program Environmental Impact Report (PEIR) Covering General Waste Discharge Requirements for Biosolids Land Application (Modified General Order). The PEIR, along with the Modified General Order, will allow for the continuance of a streamlined regulatory process for the land application of biosolids in California. The re-adoption of the Modified General Order will allow OCSD to continue Class B biosolids land application in an environmentally safe manner and help with the diversion of waste from California's landfills.

OCSD is providing the following information regarding our biosolids management situation for the SWRCB's consideration. OCSD currently produces approximately 47,500 dry tons per year of Class B biosolids at its wastewater treatment facilities. Our biosolids are managed as follows:

- 40% are land applied in Arizona and Nevada;
- 40% are chemically stabilized in Kern County; and
- 20% are composted in either Riverside County, eastern San Bernardino County, or in La Paz County, Arizona.

While never forgetting that our most important responsibility is to protect public health and the environment, wastewater treatment plant operators are also stewards of their ratepayer's fees. As such, OCSD believes that compliance with the stringent requirements of the Modified General Order not only protects public health and the environment, but also allows for the



Honorable Arthur G. Baggett Jr.
Page 2 of 3
March 15, 2004

continued use of a cost-effective means to manage California's biosolids through the land application of Class B biosolids.

As a result of bans on Class B biosolids by many California counties, OCSD has utilized the services of CH2MHILL to develop a Long-term Biosolids Management Plan (Plan). The Plan provides an in-depth analysis into the technology development requirements and the significant increase in energy and management costs of Class A biosolids options. Costs related to siting and permitting, engineering and design, capital expense, operations and maintenance (including a significant increase in energy consumption) that are required to produce Class A biosolids would result in a significant cost increase to OCSD's rate payers. When compared to 2002, the last year Class B biosolids could be land applied in Kern and Kings Counties, OCSD would experience a \$5,925,000 per year increase in biosolids management costs to produce Class A biosolids with absolutely no corresponding environmental benefit.

Our support of the conclusions set forth in the PEIR and the re-adoption of the Modified General Order is based on the demonstrated benefits of biosolids reuse. Biosolids reuse has shown to be a positive environmental practice and is strongly encouraged by the United States Environmental Protection Agency (EPA). The vast majority of the PEIR's study and the Modified General Order's requirements are based on the same sound, peer-reviewed science used to develop the EPA federal biosolids regulation. The EPA federal biosolids regulation (Part 503 Rule) took nine years to develop and was premised on over 40 years of biosolids field research, including research performed in California.

The Modified General Order not only incorporates all of the Part 503 Rule requirements, but also adds numerous requirements and restrictions that are more stringent than the federal regulations in order to protect conditions specific to California's unique environment. Several of the Modified General Order's requirements are policy-based and are significantly more conservative than science mandates. Ultimately, the Modified General Order establishes uniform requirements for biosolids recycling in California that is protective of both the public health and the environment



Honorable Arthur G. Baggett Jr.
Page 3 of 3
March 15, 2004

While OCSD supports the continued land application of Class B biosolids in California, we acknowledge that the management of Class A biosolids is also an environmentally sound management option (albeit with slightly higher impacts than Class B). Therefore, OCSD supports the availability of both options for biosolids management. OCSD feels that the Modified General Order leaves both options available without placing unnecessary financial burdens on our ratepayers.

In conclusion, OCSD supports the continued beneficial use of biosolids in California via the re-adoption of the Modified General Order for the land application of biosolids, which includes both Class B and Class A materials. OCSD urges the SWRCB to consider the findings of the January 2004 Revised Draft PEIR that identifies the Modified General Order as the environmentally superior alternative.

Michael D. Moore

Environmental Compliance and Monitoring Manager

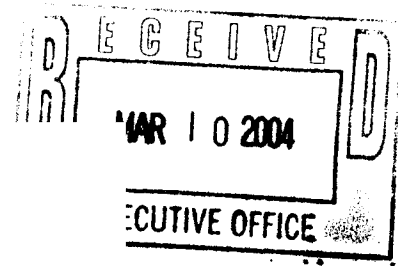
MDM:LB:jq

H:\dept\ts\620\GENERAL DATA\330\ID5_LB_SWRCB PEIR_OCSD Comments_3-15-04.doc



L-29

March 2, 2004



Honorable Arthur G. Baggett Jr., CI
California State Water Resources C
1001 "I" Street
Sacramento, California 94815

**Subject: State Water Resources Control Board (SWRCB) Draft
Revised Statewide Program Environmental Impact Report (PEIR)
Covering General Waste Discharge Requirements for Biosolids Land
Application (January 2004)**

Dear Chairman Baggett and Members of the Board:

Rancho California Water District (RCWD) would like to take this opportunity to express its appreciation for the significant amount of time and effort the State Water Resources Control Board (SWRCB) staff has dedicated to the development of the Draft Revised Statewide Program EIR (PEIR) Covering General Waste Discharge Requirements for Biosolids Land Application (Modified General Order). The PEIR, along with the Modified General Order, will allow for the continuance of a streamlined regulatory process for land applying biosolids in California. The re-adoption of the Modified General Order will allow continued biosolids land application in an environmentally safe manner and help with the diversion of waste from California's landfills.

Biosolids reuse has been shown to be a positive environmental practice that is strongly encouraged by the United States Environmental Protection Agency (EPA) and many environmental groups. The vast majority of the PEIR's study and the Modified General Order's requirements are based in the sound, peer-reviewed science used to develop the EPA federal biosolids regulation. Specifically, the Modified General Order provides California with a stringent statewide regulation of biosolids land application that builds on the extensive scientific background used in the development of the federal biosolids regulations.

The Clean Water Act (CWA), enacted in 1972 and significantly amended in 1977 and 1987, directed EPA to promulgate regulations establishing limits on the types and amounts of pollutants that can be legally discharged from various industrial, commercial, and public dischargers of wastewater. The CWA required EPA to promulgate nationally applicable pretreatment standards, which restrict pollutant discharges from industries that indirectly discharge into waterbodies by discharging into sewers. This pretreatment requirement has substantially improved the quality of the nation's biosolids. In 1993, EPA issued the Standards for the Use and

Board of Directors

John E. Hoagland
President

Csaba F. Ko
Sr. Vice President

Stephen J. Corona

Ralph H. Daily

Ben R. Drake

Lisa D. Herman

John V. Rossi

Officers:

Brian J. Brady
General Manager

Phillip L. Forbes
Director of Finance-Treasurer

E.P. "Bob" Lemons
Director of Engineering

Kenneth C. Dealy
Director of Operations
& Maintenance

Perry R. Louck
Controller

Linda M. Fregoso
District Secretary/Administrative
Services Manager

C. Michael Cowett
Best Best & Krieger LLP
General Counsel

Disposal of Sewage Sludge, otherwise known as the Part 503 Rule. The Part 503 Rule took nine years to develop and was premised on over 40 years of biosolids field research, including research performed in California. Provisions of the Modified General Order are based largely on this federal regulation to ensure California's regulation of biosolids incorporates the extensive health risk assessment and scientific review that went along with the development of the federal regulation.

The Modified General Order not only incorporates all of the Part 503 Rule requirements but also adds numerous requirements and restrictions that are more stringent than the federal regulations in order to protect conditions specific to California's unique environment. Several of the Modified General Order's requirements are policy-based, and are significantly more conservative than required by science. These policy-based requirements were developed and included in the Modified General Order to address perception concerns. The Modified General Order ultimately provides for uniform requirements for biosolids recycling in California that is both protective of public health and the environment.

RCWD is providing the following information regarding our specific biosolids management situation for the Board's consideration. RCWD currently produces 800 dry tons per year of sub-Class B biosolids at its wastewater treatment facility. Our biosolids are managed as follows: 100 percent (100%) of the biosolids are land applied.

While never forgetting that our most important responsibility is to protect public health and the environment, wastewater treatment plant operators are also stewards of their ratepayers' fees. As such, RCWD believes that compliance with the stringent Modified General Order requirements not only protects public health and the environment but also allows for the continued use of a cost-effective means to manage California's biosolids through the land application of Class B biosolids.

While the PEIR indicates that the overall impact of producing and land applying Class B biosolids is somewhat less than that associated with the production of Class A biosolids, RCWD considers both to be environmentally sound biosolids management techniques and as such we support the availability of both options for biosolids management. The environmentally superior alternative identified in the PEIR as the Modified General Order does just that. The Modified General Order regulates the land application of biosolids, including both Class B and Class A materials, making both of these management options available to California's wastewater treatment agencies.

It is important to note that the land application of Class B biosolids remains the most widely used management option for biosolids in California, as well as in the United States. CASA believes that the preservation of the Class B land application option through the re-adoption of the Modified General Order is an integral aspect of a statewide program that encourages the beneficial use of biosolids. The land application of biosolids allows for the addition of valuable nutrients to the soil and conserves water supplies by



increasing the water holding capacity of the soil. The safety of Class B biosolids is underscored by decades of scientific research, including two studies by the National Academy of Sciences, and biosolids are one of the most studied materials ever regulated by the United States Environmental Protection Agency.

In conclusion, RCWD supports the continued beneficial use of biosolids in California via the re-adoption of the Modified General Order for the land application of biosolids, which includes both Class B and Class A materials. We urge the SWRCB to consider the findings of the January 2004 Revised Draft PEIR that identifies the Modified General Order as the environmentally superior alternative. RCWD supports land application of Class B and Class A materials as a cost effective/safe means of biosolids disposal.

Sincerely,

RANCHO CALIFORNIA WATER DISTRICT



Michael M. Calvert
Water Reclamation Manager

CC: Mr. Gary Carlton, SWRCB Board Member
Mr. Richard Katz, SWRCB Board Member
Mr. Peter Silva, SWRCB Board Member
Ms. Nancy Sutley, SWRCB Board Member





L-30

CT 2564
Wastewater Treatment

ML

10545 Armstrong Avenue

Mather

California

95655

Tele: [916] 876-6000

Fax: [916] 876-6160

Website: www.srcsd.com

Board of Directors

County of Sacramento

Roger Dickinson

Illa Collin

Muriel P. Johnson

Roger Niello

Don Nottoli

City of Citrus Heights

Jeannie Bruins

City of Elk Grove

Sophia Scherman

City of Folsom

Kerri Howell

City of Rancho Cordova

Dave Roberts

City of Sacramento

Heather Fargo

Cheryl Creson

Agency Administrator

Robert F. Shanks

District Engineer

Marcia Maurer

Chief Financial Officer

Wendell H. Kido

District Manager

Mary K. Snyder

Collection Systems Manager

Stan R. Dean

Plant Manager

March 8, 2004

Honorable Arthur G. Baggett Jr., Chair
California State Water Resources Control Board
1001 "T" Street
Sacramento, California 94815

**Subject: State Water Resources Control Board (SWRCB) Draft
Revised Statewide Program Environmental Impact Report
(PEIR) Covering General Waste Discharge Requirements
for Biosolids Land Application (January 2004)**

Dear Chairman Baggett and Members of the Board:

The Sacramento Regional County Sanitation District (SRCSD) would like to express its appreciation for the significant amount of time and effort the State Water Resources Control Board (SWRCB) staff has dedicated to the development of the Draft Revised Statewide Program EIR (PEIR) Covering General Waste Discharge Requirements for Biosolids Land Application (Modified General Order). The PEIR along with the Modified General Order will allow for the continuance of a streamlined regulatory process for land applying biosolids in California. The re-adoption of the Modified General Order will allow the SRCSD the flexibility to use Class B biosolids land application in an environmentally safe manner for managing biosolids.

While never forgetting that our most important responsibility is to protect public health and the environment, wastewater treatment plant operators are also stewards of their ratepayers fees. As such, SRCSD believes that compliance with the stringent Modified General Order requirements not only protects public health and the environment but also allows for the continued use of a cost-effective means to manage California's biosolids through the land application of Class B biosolids.

Our support of the conclusions set forth in the PEIR and the re-adoption of the Modified GO is based on the demonstrated benefits of biosolids reuse. Biosolids reuse has been shown to be a positive environmental practice that is strongly encouraged by the United States Environmental Protection Agency (EPA). The vast majority of the PEIR's study and the Modified General Order's requirements are based in the sound, peer-reviewed science used to develop the EPA federal biosolids regulation. The EPA federal biosolids regulation (Part 503 rule) took nine years to develop and was premised on over 40 years of biosolids field research, including research performed in California.

emailed 3/23
MAR 19
LITON/TK
EXECUTIVE CC

Recycled with nature

The Modified General Order not only incorporates all of the Part 503 Rule requirements but also adds numerous requirements and restrictions that are more stringent than the federal regulations in order to protect conditions specific to California's unique environment. Several of the Modified General Order's requirements are policy-based, and are significantly more conservative than required by science. The Modified General Order ultimately provides for uniform requirements for biosolids recycling in California that is both protective of public health and the environment

While we support the continued land application of Class B biosolids in California, we acknowledge that the management of Class A biosolids is also an environmentally sound (albeit with higher impacts than Class B) management option and thus we support the availability of both options for biosolids management. We feel the Modified GO leaves both options available without placing unnecessary financial burdens on our ratepayers.

In conclusion, the SRCSD supports the continued beneficial use of biosolids in California via the re-adoption of the Modified General Order for the land application of biosolids, which includes both Class B and Class A materials. We urge the SWRCB to consider the findings of the January 2004 Revised Draft PEIR that identifies the Modified General Order as the environmentally superior alternative.

Sincerely,

A handwritten signature in black ink, appearing to read "Wendell H. Kido". The signature is fluid and cursive, with the first name being the most prominent.

Wendell H. Kido
District Manager

WHK/RRR:gjl (General Order Support Letter 3-8-04)

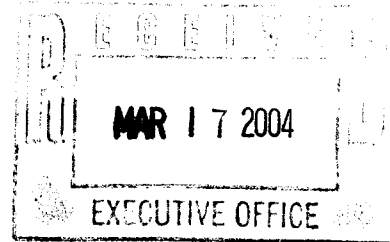
cc: Marlaigne Hudnall
CASA Biosolids Program Manager

*Environmental Services Department*

DIRECTOR'S OFFICE

March 15, 2004

Honorable Arthur G. Baggett Jr., Chair and Members
California State Water Resources Control Board
1001 "T" Street
Sacramento, CA 94815



SUBJECT: Draft Revised Statewide Program Environmental Impact Report (PEIR) Covering General Waste Discharge Requirements for Biosolids Land Application (February 2004)

Dear Chairman Baggett and Members of the Board:

The City of San Jose (City) would like to thank you for the opportunity to submit comments on the State Water Resources Control Board's (SWRCB's) February 2004 Draft Revised *Program Environmental Impact Report (PEIR) Covering General Waste Discharge Requirements for Biosolids Land Application* on behalf of the San José/Santa Clara Water Pollution Control Plant (Plant).

The Plant provides wastewater treatment services to the cities of San José and Santa Clara, and other cities and agencies within the tributary area. These include the City of Milpitas, West Valley Sanitary District (Cities of Campbell, Los Gatos, Monte Sereno and Saratoga), Burbank Sanitary District, Cupertino Sanitary District (City of Cupertino), Sunol Sanitary District, and Country Sanitation Districts #2 and #3. The Plant service area includes approximately 1.4 million residents and over 16,000 businesses in Silicon Valley.

The City strongly supports and appreciates the efforts of the SWRCB to streamline the regulatory process for land applying biosolids in California through the development of the Draft Revised PEIR. In particular, the City supports the goals set forth in the General Order (GO) that includes providing "a flexible framework that allows implementation of a biosolids land application program at the regional level and contains requirements that are based on sound science and best professional judgment."¹

The City believes that the proposed GO includes land application controls that are more stringent than those included in the Part 503 regulations and that the GO is both protective of public health and the environment.

¹ February 2004 Draft Revised PEIR, p. ES-7.



The Plant has been beneficially reusing approximately 60,000 to 80,000 dry-tons of Class A Exceptional Quality biosolids annually, primarily as alternate daily cover for landfill applications for over a decade. The City appreciates that not all treatment plants are able to produce Class A biosolids; therefore, we support the continued option for land application of Class B biosolids in California as outlined in the modified GO.

San José's Environmental Services Department's watershed protection program, which includes Plant operation and biosolids reuse, uses a principle of basing decisions on sound science as a fundamental building block for the program. The City strongly supports the use of data in this EIR, for example the use of EPA's 5-year dioxin study, as the basis of a finding that dioxins from biosolids do not pose a significant risk to human health or the environment; therefore, removing one obstacle for the continued beneficial reuse of biosolids.

Again, the City of San José supports the revisions made to the Draft PEIR and believe that it will lead to uniform requirements for biosolids reuse in California. In addition to submitting these comments, the City also joins in and incorporates by reference herein comments that have been submitted on the Draft Revised *Program Environmental Impact Report (PEIR) Covering General Waste Discharge Requirements for Biosolids Land Application* by the Bay Area Clean Water Agencies (BACWA).

If you have any questions, please contact Ron Garner, Deputy Director of the San José/Santa Clara Water Pollution Control Plant at 408-945-5316.

Sincerely,

A handwritten signature in black ink, appearing to read 'Carl W. Mosher', with a horizontal line extending to the right.

Carl W. Mosher, Director
Environmental Services Department



SOUTHERN CALIFORNIA ALLIANCE OF
PUBLICLY OWNED TREATMENT WORKS

March 1, 2004

L-32

Mr. Wayne Verrill
State Water Resources Control Board
Management Practices Support Unit
Division of Water Quality
P. O. Box 100
Sacramento, CA 95812

Dear Mr. Verrill:

**Revised Draft Statewide Program EIR Covering General Waste Discharge
Requirements for Biosolids Land Application**

The Southern California Alliance of Publicly Owned Treatment Works (SCAP) appreciates this opportunity to express its appreciation for the significant amount of time and effort the State Water Resources Control Board (SWRCB) staff has dedicated to the development of the Draft Revised Statewide Program EIR (PEIR) Covering General Waste Discharge Requirements for Biosolids Land Application (Modified General Order). The State Board is to be commended for completing this project and continuing with the process to amend the EIR and adopt a general order. SCAP is a non-profit corporation with a membership of 61 agencies that provide both water and wastewater treatment to nearly 18 million people in parts of Los Angeles, Orange, San Diego, Santa Barbara, Riverside, San Bernardino, and Ventura counties. The re-adoption of the General Order (GO) will allow for the continuance of a streamlined regulatory process for land applying biosolids in California and allow our member agencies to continue biosolids land application in an environmentally safe manner and help with the diversion of waste from California's landfills.

The State Board modified GO is based on sound peer-reviewed science that was used to develop the federal regulations for the use of biosolids and was used as the baseline when developing more stringent regulations specifically for California. SCAP believes that compliance with the stringent Modified General Order requirements not only protects public health and the environment but also allows for the continued use of a cost-effective means to manage California's biosolids through the land application of Class B biosolids. SCAP member agencies produce Class B and Class A biosolids, and consider both to be environmentally sound biosolids management techniques and, as such, we support the availability of both options for biosolids management.

SCAP appreciates this opportunity to provide input and would like to thank all concerned for their efforts. In order to ensure statewide management options are available through a uniform regulatory process, SCAP requests that the SWRCB certify the revised EIR and re-adopt the GO for the land application of biosolids. Should you have any questions or require any additional information, please do not hesitate to contact me at (949) 489-7676.

Very truly yours,

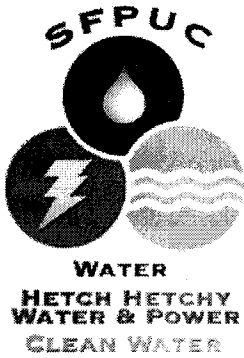


Raymond C. Miller
SCAP Executive Director

30200 Rancho Viejo Road, Suite B

San Juan Capistrano, CA 92675

Fax: 949/489-0150 Tel: 949/489-7676



L-33

SAN FRANCISCO PUBLIC UTILITIES COMMISSION

1155 Market St., 11th Floor, San Francisco, CA 94103 • Tel. (415) 554-3155 • Fax (415) 554-3161



March 15, 2004

Honorable Arthur G. Baggett Jr., Chair
California State Water Resources Control Board
1001 "I" Street
Sacramento, California 94815

GAVIN NEWSOM
MAYOR

E. DENNIS NORMANDY
PRESIDENT

ROBERT J. COSTELLO
VICE PRESIDENT

ANN MOLLER CAEN
ADAM WERBACH
RYAN L. BROOKS

PATRICIA E. MARTEL
GENERAL MANAGER

**Subject: State Water Resources Control Board (SWRCB) Draft Revised
Statewide Program Environmental Impact Report (PEIR)
Covering General Waste Discharge Requirements for Biosolids
Land Application (January 2004)**

Dear Chairman Baggett and Members of the Board:

San Francisco Public Utilities Commission (SFPUC) is taking this opportunity to express its appreciation for the significant amount of time and effort the State Water Resources Control Board (SWRCB) staff has dedicated to the development of the Draft Revised Statewide Program EIR (PEIR,) covering the General Waste Discharge Requirements for Biosolids Land Application (Modified General Order). The PEIR along with the Modified General Order will allow for the continuance of a streamlined regulatory process for land applying biosolids in California. The re-adoption of the Modified General Order will allow the SFPUC to continue Class B biosolids land application in an environmentally safe manner and help with the diversion of waste from California's landfills.

The San Francisco Public Utilities Commission, Water Pollution Control Division is providing the following information regarding our specific biosolids management situation to the Board for consideration. In 2003, the SFPUC produced 20,833 dry tons per year of Class B biosolids at its wastewater treatment facilities. Of this total, nine percent (9%) of our biosolids were land applied in Solano County. We anticipate that in 2004 the portion of biosolids directed to land application will increase to at least 20% of our annual production. In addition, the SFPUC has joined with other agencies nationwide as a National Biosolids Partnership demonstration agency for the development of an Environmental Management System (EMS) for biosolids. Through programmatic review and public communication and outreach, the goal of the program is to develop more transparency and foster public support for our biosolids program.

While never forgetting that our most important responsibility is to protect public health and the environment, wastewater treatment plant operators are also stewards of their ratepayers fees. As such, the SFPUC believes that compliance with the stringent Modified General Order requirements not only protects public health and the environment but also allows for the continued use of a cost-effective means to manage California's biosolids through the land application of Class B biosolids.

As a result of many of California's counties banning the land application of Class B biosolids, the SFPUC has performed research into the development of Class A biosolids technologies. It is estimated that the cost to the SFPUC to upgrade the treatment of biosolids from Class B to Class A is in the tens of millions of dollars up to sixty million dollars, and an increase of up to a one million dollars per year for O&M costs, primarily due to increased energy consumption. However, if we were required to dry the sludge to achieve Class A and a greater than 50% total solids concentration at the plant, the capital cost will go up to over two hundred million dollars.

San Francisco Public Utilities Commission, Water Pollution Control Division is in the process of developing a new Master Plan for wastewater collection and treatment, including revamped solids handling facilities at the Southeast Water Pollution Control Plant. As much as possible in a dynamic world, the City needs certainty and reliability regarding options for biosolids reuse to make informed decisions and choices for solids handling facilities and treatment processes that will serve the City's needs for the next 30 to 50 years. Reaffirming support for land application of Class B biosolids by certifying the PEIR and adopting the Modified General Order, will factor into the decisions regarding this upcoming infrastructure investment by the SFPUC.

Our support of the conclusions set forth in the PEIR and the re-adoption of the Modified General Order is based on the demonstrated benefits of biosolids reuse. Biosolids reuse has been shown to be a positive environmental practice that is strongly encouraged by the United States Environmental Protection Agency (EPA). The vast majority of the PEIR's study and the Modified General Order's requirements are based in the sound, peer-reviewed science used to develop the EPA federal biosolids regulation. The EPA federal biosolids regulation (Part 503 rule) took nine years to develop and was premised on over 40 years of biosolids field research, including research performed in California.

The Modified General Order not only incorporates all of the Part 503 Rule requirements but also adds numerous requirements and restrictions that are more stringent than the federal regulations in order to protect conditions specific to California's unique environment. Several of the Modified General Order's requirements are policy-based, and are significantly more conservative than required by science. The Modified General Order ultimately provides for uniform requirements for biosolids recycling in California that is both protective of public health and the environment

While we support the continued land application of Class B biosolids in California, we acknowledge that the management of Class A biosolids is also an environmentally sound (albeit with higher cost impacts than Class B) management option and thus we support the availability of both options for biosolids management. We feel the

Modified General Order leaves both options available without placing unnecessary financial burdens on our ratepayers.

In conclusion, SFPUC supports the continued beneficial use of biosolids in California via the re-adoption of the Modified General Order for the land application of biosolids, which includes both Class B and Class A materials. We urge the SWRCB to consider the findings of the January 2004 Revised Draft PEIR that identifies the Modified General Order as the environmentally superior alternative.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Carlin', with a stylized flourish at the end.

Michael P. Carlin
Manager, Planning Bureau

cc: W. Keaney, Manager, Water Pollution Control Division
J. Loiacono, Water Pollution Control Division



L-34

SOUTH BAYSIDE SYSTEM AUTHORITY

JOINT POWERS AUTHORITY

A Public Entity

1400 Radio Road • Redwood City, California 94065-1220 •

650/591-7121

FAX 650/591-7122

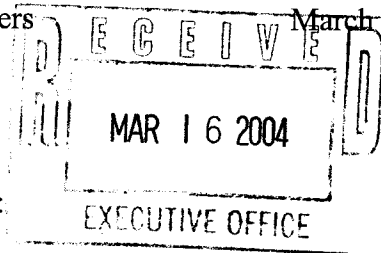
City of Belmont

City of Redwood City

City of San Carlos

West Bay Sanitary District

Honorable Arthur G. Baggett Jr., Chair and Members
California State Water Resources Control Board
1001 "T" Street
Sacramento, CA 94815



March 12, 2004

13-90

Dear Chairman Baggett and Members of the Board:

**Subject: Draft Revised Statewide Program Environmental Impact Report (PEIR)
Covering General Waste Discharge Requirements for Biosolids Land
Application (February 2004)**

South Bayside System Authority (SBSA) appreciates the significant amount of time and effort invested by the State Water Resources Control Board in the development of the Draft Revised Statewide Program EIR (PEIR) and the Modified General Order, which will allow for the continuance of a streamlined regulatory process for land applying biosolids in California. The re-adoption of the Modified General Order will allow California agencies to continue Class B biosolids land application in an environmentally safe manner, and also help with the diversion of waste from California's landfills.

SBSA has been recycling biosolids since 1985, and supports continued land application of biosolids as a safe and environmentally beneficial practice. We support the conclusions set forth in the PEIR and the re-adoption of the Modified GO, based on the demonstrated benefits of biosolids reuse. Biosolids reuse has been shown to be a positive environmental practice that is strongly encouraged by the United States Environmental Protection Agency (EPA). The Modified General Order not only incorporates all of the Federal regulations, but also adds numerous requirements and restrictions that are more stringent than the federal regulations in order to protect conditions specific to California's environment. The Modified General Order ultimately provides for uniform requirements for biosolids recycling in California that is both protective of public health and the environment.

We support the continued land application of Class B biosolids in California. We also recognize that it is important for California POTWs to have multiple options available to them for alternative means of biosolids recycling or disposal. Use of Class A biosolids is also an environmentally sound management option and thus we support the availability of both options for biosolids management. We believe that the Modified GO leaves both options of Class A and Class B available without placing unnecessary financial burdens on our ratepayers.

Honorable Arthur G. Baggett, Jr.

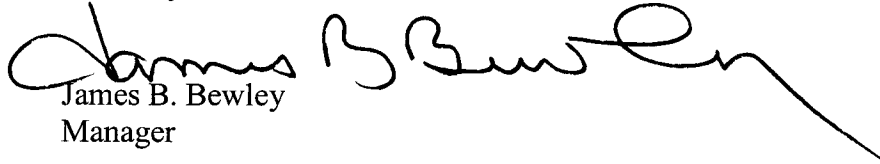
March 12, 2004

Page 2

In conclusion, SBSA supports the continued beneficial use of biosolids in California via the re-adoption of the Modified General Order for the land application of biosolids, which includes both Class B and Class A materials. We urge the SWRCB to adopt the findings of the February 2004 Revised Draft PEIR that identifies the Modified General Order as the environmentally superior alternative.

Thank you.

Sincerely,


James B. Bewley
Manager

cc: Mr. Gary Carlton, SWRCB Board Member
Mr. Richard Katz, SWRCB Board Member
Mr. Peter Silva, SWRCB Board Member
Ms. Nancy Sutley, SWRCB Board Member

P.S. Art -
I guess persistence pays
off - In 1997 I was the
"new guy" on the CASA Executive
Board and carried the idea
of "passing the hat" and collecting
the 1/2 million dollars it took
to get this on the way.





March 15, 2004

Honorable Arthur G. Baggett, Jr., Chair
CALIFORNIA STATE WATER RESOURCES CONTROL BOARD
1001 "I" Street
Sacramento, CA 94815

**Subject: State Water Resources Control Board (SWRCB) Draft Revised
Statewide Program Environmental Impact Report (PEIR)
Covering General Waste Discharge Requirements for Biosolids
Land Application (February 2004)**

Dear Chairman Baggett and Members of the Board:

The South Orange County Wastewater Authority (SOCWA) appreciates this opportunity to express its appreciation for the significant amount of time and effort the State Water Resources Control Board (SWRCB) staff has dedicated to the development of the Draft Revised Statewide Program EIR (PEIR) Covering General Waste Discharge Requirements for Biosolids Land Application (Modified General Order). The PEIR along with the Modified General Order will allow for the continuance of a streamlined regulatory process for land applying biosolids in California. The re-adoption of the Modified General Order will allow the South Orange County Wastewater Authority to continue Class B biosolids land application in an environmentally safe manner and help with the diversion of waste from California's landfills.

SOCWA is providing the following information regarding our specific biosolids management situation for the Board's consideration. SOCWA currently produces 6,000 dry tons per year of Class B biosolids at its wastewater treatment facilities. Our biosolids are managed as follows: forty percent (40%) of the biosolids are land applied, fifty percent (50%) composted and ten percent (10%) are disposed of in a landfill.

While never forgetting that our most important responsibility is to protect public health and the environment, wastewater treatment plant operators are also stewards of their ratepayers' fees. As such, SOCWA believes that compliance with the stringent Modified General Order requirements not only protects public health and the environment but also allows for the continued use of a cost-effective means to manage California's biosolids through the land application of Class B biosolids.

As a result of many California counties banning the land application of Class B biosolids, SOCWA has performed research into the development of Class A biosolids technologies. The onerous siting and permitting requirements in addition to increased energy consumption and tremendous capital expense would result in substantial costs to SOCWA to produce Class A biosolids with absolutely no corresponding environmental benefit.

Our support of the conclusions set forth in the PEIR and the re-adoption of the Modified General Order is based on the demonstrated benefits of biosolids reuse. Biosolids reuse has been shown to be a positive environmental practice that is strongly encouraged by the United States Environmental Protection Agency (EPA). The vast majority of the PEIR's study and the Modified General Order's requirements are based in the sound, peer-reviewed science used to develop the EPA federal biosolids regulation. The EPA federal biosolids regulation (Part 503 Rule) took nine years to develop and was premised on over 40 years of biosolids field research, including research performed in California.

The Modified General Order not only incorporates all of the Part 503 Rule requirements, but also adds numerous requirements and restrictions that are more stringent than the federal regulations in order to protect conditions specific to California's unique environment. Several of the Modified General Order's requirements are policy-based, and are significantly more conservative than required by science. The Modified General Order ultimately provides for uniform requirements for biosolids recycling in California that is both protective of public health and the environment.

While we support the continued land application of Class B biosolids in California, we acknowledge that the management of Class A biosolids is also an environmentally sound (albeit with slightly higher impacts than Class B) management option and thus we support the availability of both options available without placing unnecessary financial burdens on our ratepayers.

In conclusion, SOCWA supports the continued beneficial use of biosolids in California via the re-adoption of the Modified General Order for the land application of biosolids, which includes both Class B and Class A materials. We urge the SWRCB to consider the findings of the February 2004 Revised Draft PEIR that identifies the Modified General Order as the environmentally superior alternative.

Very truly yours,

SOUTH ORANGE COUNTY WASTEWATER AUTHORITY



David A. Caretto
General Manager

rtl

cc: SOCWA Board of Directors
CASA
SCAP



L-36

MAR 25 2004

SUSANVILLE CONSOLIDATED SANITARY DISTRICT

March 17, 2004

45 South Roop Street
P.O. Box 152
Susanville, California 96130
(530) 257-5665

Honorable Arthur G. Baggett, Jr., Chair
California State Water Resources Control Board
1001 "I" Street
Sacramento, CA 94815

**Subject: State Water Resources Control Board (SWRCB) Draft Revised
Statewide Program Environmental Impact Report (PEIR) Covering
General Waste Discharge Requirements for Biosolids Land
Application (February 2004)**

Dear Chairman Baggett and Members of the Board:

The Susanville Consolidated Sanitary District (SCSD) appreciates this opportunity to express its appreciation for the significant amount of time and effort the State Water Resources Control Board (SWRCB) staff has dedicated to the development of the Draft Revised Statewide Program EIR (PEIR) Covering General Waste Discharge Requirements for Biosolids Land Application (Modified General Order). The PEIR along with the Modified General Order will allow for the continuance of a streamline regulatory process for land applying biosolids in California. The re-adoption of the Modified General Order will allow the SCSD to continue Class B biosolids land application in an environmentally safe manner and help with the diversion of waste from California's landfills.

SCSD is providing the following information regarding our specific biosolids management situation for the Board's consideration. The SCSD currently produces 66 dry tons per year of Class B biosolids at its wastewater treatment facilities. Our biosolids are managed as follows: 100 percent (100%) of the biosolids are land applied.

While never forgetting that our most important responsibility is to protect public health and the environment, wastewater treatment plant operators are also stewards of their ratepayers fees. As such, SCSD believes that compliance with the stringent Modified General Order requirements not only protects public health and the environment but also allows for the continued use of a cost-effective means to manage California's biosolids through the land application of Class B biosolids.

As a result of many California's counties banning the land application of Class B biosolids, SCSD has performed research into the development of Class A biosolids technologies. The onerous siting and permitting requirements in addition to increased energy consumption and tremendous capital expense of \$1.2 million dollars would result in approximately \$180,000./year for SCSD to produce Class A biosolids with absolutely no corresponding environmental benefit. SCSD is servicing a community of 8,900 people.

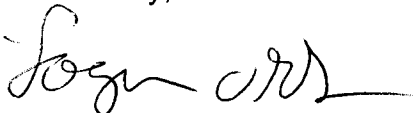
Our support of the conclusions set forth in the PEIR and the re-adoption of the Modified General Order is based on the demonstrated benefits of biosolids reuse. Biosolids reuse has been shown to be a positive environmental practice that is strongly encouraged by the United States Environmental Protection Agency (EPA). The vast majority of the PEIR's study and the Modified General Order's requirements are based in the sound, peer-reviewed science used to develop the EPA federal biosolids regulation. The EPA federal biosolids regulation (Part 503 rule) took nine years to develop and was premised on over 40 years of biosolids field research, including research performed in California.

The Modified General Order not only incorporates all of the Part 503 Rule requirements but also adds numerous requirements and restrictions that are more stringent than the federal regulations in order to protect conditions specific to California's unique environment. Several of the Modified General Order's requirements are policy-based, and are significantly more conservative than required by science. The Modified General Order ultimately provides for uniform requirements for biosolids recycling in California that is both protective of public health and the environment.

While we support the continued land application of Class B biosolids in California, we acknowledge that the management of Class A biosolids is also an environmentally sound (albeit with slightly higher impacts than Class B) management option and thus we support the availability of both options for biosolids management. We feel the Modified General Order leaves both options available without placing unnecessary financial burdens on our ratepayers.

In conclusion, SCSD supports the continued beneficial use of biosolids in California via the re-adoption of the Modified General Order for the land application of biosolids, which includes both Class B and Class A materials. We urge the SWRCB to consider the findings of the February 2004 Revised Draft PEIR that identifies the Modified General Order as the environmentally superior alternative.

Sincerely,

A handwritten signature in black ink, appearing to read "Logan Olds", followed by a horizontal flourish.

Logan Olds
General Manager



March 12, 2004

L-37

MAR 17 2004

EXECUTIVE OFFICE

Directors

Pat Kite

Anjali Lathi

Ken Smith

Jennifer Toy

Dan Wilkowsky

Officers

Richard B. Currie

General Manager

District Engineer

David M. O'Hara

Attorney

Honorable Arthur G. Baggett Jr., Chair and Members
California State Water Resources Control Board
1001 "I" Street
Sacramento, CA 94815

Dear Chairman Baggett and Members of the Board:

**Subject: Draft Revised Statewide Program Environmental Impact Report (PEIR)
Covering General Waste Discharge Requirements for Biosolids Land
Application (February 2004)**

Union Sanitary District appreciates the significant amount of time and effort invested by the State Water Resources Control Board in the development of the Draft Revised Statewide Program EIR (PEIR) and the Modified General Order, which will allow for the continuance of a streamlined regulatory process for land applying biosolids in California. The re-adoption of the Modified General Order will allow California agencies to continue Class B biosolids land application in an environmentally safe manner, and also help with the diversion of waste from California's landfills.

Union Sanitary District has been recycling biosolids since 1994, and support continued land application of biosolids as a safe and environmentally beneficial practice. We support the conclusions set forth in the PEIR and the re-adoption of the Modified GO, based on the demonstrated benefits of biosolids reuse. Biosolids reuse has been shown to be a positive environmental practice that is strongly encouraged by the United States Environmental Protection Agency (EPA). The Modified General Order not only incorporates all of the Federal regulations, but also adds numerous requirements and restrictions that are more stringent than the federal regulations in order to protect conditions specific to California's unique environment. The Modified General Order ultimately provides for uniform requirements for biosolids recycling in California that is both protective of public health and the environment.

We support the continued land application of Class B biosolids in California. We also recognize that it is important for California POTWs to have multiple options available to them for alternative means of biosolids recycling or disposal. Management of Class A biosolids is also an environmentally sound, albeit with slightly higher environmental impacts and slightly lower nutrient value than that of Class B management option and thus we support the availability of both options for biosolids management. We believe that the Modified GO leaves both options available without placing unnecessary financial burdens on our ratepayers.

Honorable Arthur G. Baggett, Jr.

March 12, 2004

Page 2

In conclusion, Union Sanitary District supports the continued beneficial use of biosolids in California via the re-adoption of the Modified General Order for the land application of biosolids, which includes both Class B and Class A materials. We urge the SWRCB to adopt the findings of the February 2004 Revised Draft PEIR that identifies the Modified General Order as the environmentally superior alternative.

Thank you.

Sincerely,

A handwritten signature in black ink that reads "Richard B. Currie". The signature is written in a cursive style with a large, stylized "R" and "C".

Richard B. Currie

General Manager/District Engineer

cc: Mr. Gary Carlton, SWRCB Board Member
Mr. Richard Katz, SWRCB Board Member
Mr. Peter Silva, SWRCB Board Member
Ms. Nancy Sutley, SWRCB Board Member

VENTURA REGIONAL SANITATION DISTRICT

1001 PARTRIDGE DRIVE, SUITE 150 • VENTURA, CA 93003-5562

A Public
Waste
Management
Agency

March 18, 2004

MAR 24 2004

EXECUTIVE OFFICE

Honorable Arthur G. Baggett Jr., Chair
California State Water Resources Control Board
1001 "T" Street
Sacramento, California 94815

**State Water Resources Control Board (SWRCB) Draft Revised Statewide Program
Environmental Impact Report (PEIR) Covering General Waste Discharge Requirements
for Biosolids Land Application (February 2004)**

Dear Chairman Baggett and Members of the Board:

The Ventura Regional Sanitation District appreciates this opportunity to express its appreciation for the significant amount of time and effort the State Water Resources Control Board (SWRCB) staff has dedicated to the development of the Draft Revised Statewide Program EIR (PEIR) Covering General Waste Discharge Requirements for Biosolids Land Application (Modified General Order). The PEIR along with the Modified General Order will allow for the continuance of a streamlined regulatory process for land applying biosolids in California.

While never forgetting that our most important responsibility is to protect public health and the environment, wastewater treatment plant operators are also stewards of their ratepayers fees. As such, the Ventura Regional Sanitation District believes that compliance with the stringent Modified General Order requirements not only protects public health and the environment but also allows for the continued use of a cost-effective means to manage California's biosolids through the land application of Class B biosolids.

Our support of the conclusions set forth in the PEIR and the re-adoption of the Modified General Order is based on the demonstrated benefits of biosolids reuse. Biosolids reuse has been shown to be a positive environmental practice that is strongly encouraged by the United States Environmental Protection Agency (EPA). The vast majority of the PEIR's study and the Modified General Order's requirements are based in the sound, peer-reviewed science used to develop the EPA federal biosolids regulation. The EPA federal biosolids regulation (Part 503 rule) took nine years to develop and was premised on over 40 years of biosolids field research, including research performed in California.

The Modified General Order not only incorporates all of the Part 503 Rule requirements but also adds numerous requirements and restrictions that are more stringent than the federal regulations in order to protect conditions specific to California's unique environment. Several of the Modified General Order's requirements are policy-based, and are significantly more conservative than required by science. The Modified General Order ultimately provides for uniform requirements for biosolids recycling in California that is both protective of public health and the environment.

Ventura County • **CITIES:** Camarillo • Fillmore • Ojai • Oxnard • Port Hueneme • San Buenaventura • Santa Paula • Thousand Oaks

SPECIAL DISTRICTS: Camarillo Sanitary • Camrosa Water • Channel Islands Beach Community Services • Montalvo Municipal Improvement •

Ojai Valley Sanitary • Saticoy Sanitary • Triunfo Sanitation • Ventura County Waterworks Nos. 1 and 16

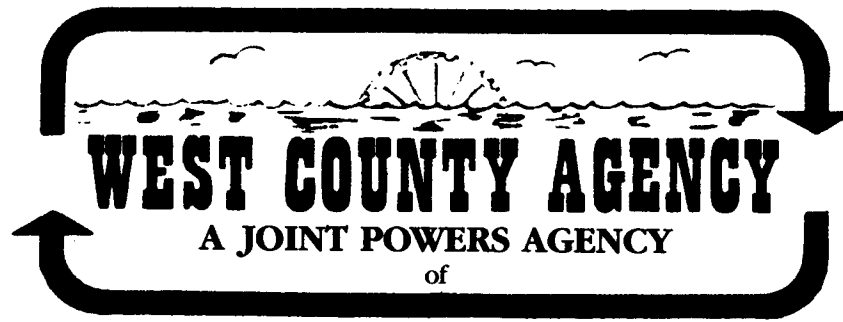
While we support the continued land application of Class B biosolids in California, we acknowledge that the management of Class A biosolids is also an environmentally sound (albeit with slightly higher impacts than Class B) management option and thus we support the availability of both options for biosolids management. We feel the Modified General Order leaves both options available without placing unnecessary financial burdens on our ratepayers.

In conclusion, the Ventura Regional Sanitation District supports the continued beneficial use of biosolids in California via the re-adoption of the Modified General Order for the land application of biosolids, which includes both Class B and Class A materials. We urge the SWRCB to consider the findings of the February 2004 Revised Draft PEIR that identifies the Modified General Order as the environmentally superior alternative.

Sincerely,

A handwritten signature in cursive script, appearing to read "Brian Brennan", written in dark ink.

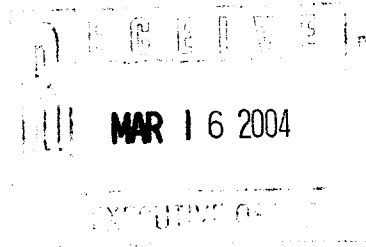
BRIAN BRENNAN – CHAIRMAN
VENTURA REGIONAL SANITATION DISTRICT



2910 Hilltop Drive
Richmond, California 94806-1974
(510) 222-6700

West County Wastewater District
and
City of Richmond Municipal Sewer District

March 12, 2004



Honorable Arthur G. Baggett Jr., Chair
California State Water Resources Control Board
1001 "T" Street
Sacramento, California 94815

Subject: State Water Resources Control Board (SWRCB) Draft Revised Statewide Program Environmental Impact Report (PEIR) Covering General Waste Discharge Requirements for Biosolids Land Application (February 2004)

Dear Chairman Baggett and Members of the Board:

West County Agency appreciates this opportunity to express its appreciation for the significant amount of time and effort the State Water Resources Control Board (SWRCB) staff has dedicated to the development of the Draft Revised Statewide Program EIR (PEIR) Covering General Waste Discharge Requirements for Biosolids Land Application (Modified General Order). The PEIR along with the Modified General Order will allow for the continuance of a streamlined regulatory process for land applying biosolids in California. The re-adoption of the Modified General Order will allow the West County Agency to continue Class B biosolids land application in an environmentally safe manner and help with the diversion of waste from California's landfills.

While never forgetting that our most important responsibility is to protect public health and the environment, wastewater treatment plant operators are also stewards of their ratepayers fees. As such, West County Agency believes that compliance with the stringent Modified General Order requirements not only protects public health and the environment but also allows for the continued use of a cost-effective means to manage California's biosolids through the land application of Class B biosolids.

Our support of the conclusions set forth in the PEIR and the re-adoption of the Modified GO is based on the demonstrated benefits of biosolids reuse. Biosolids reuse has been shown to be a positive environmental practice that is strongly encouraged by the United States Environmental Protection Agency (EPA). The vast majority of the PEIR's study and the

Honorable Arthur G. Baggett Jr., Chair
California State Water Resources Control Board
Draft Revised Statewide PEIR
March 12, 2004
Page 2

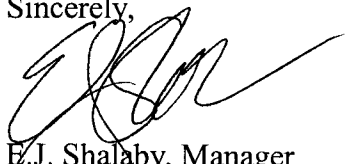
Modified General Order's requirements are based in the sound, peer-reviewed science used to develop the EPA federal biosolids regulation. The EPA federal biosolids regulation (Part 503 rule) took nine years to develop and was premised on over 40 years of biosolids field research, including research performed in California.

The Modified General Order not only incorporates all of the Part 503 Rule requirements but also adds numerous requirements and restrictions that are more stringent than the federal regulations in order to protect conditions specific to California's unique environment. Several of the Modified General Order's requirements are policy-based, and are significantly more conservative than required by science. The Modified General Order ultimately provides for uniform requirements for biosolids recycling in California that is both protective of public health and the environment

While we support the continued land application of Class B biosolids in California, we acknowledge that the management of Class A biosolids is also an environmentally sound (albeit with slightly higher impacts than Class B) management option and thus we support the availability of both options for biosolids management. We feel the Modified GO leaves both options available without placing unnecessary financial burdens on our ratepayers.

In conclusion, West County Agency supports the continued beneficial use of biosolids in California via the re-adoption of the Modified General Order for the land application of biosolids, which includes both Class B and Class A materials. We urge the SWRCB to consider the findings of the February 2004 Revised Draft PEIR that identifies the Modified General Order as the environmentally superior alternative.

Sincerely,



E.J. Shalaby, Manager
West County Agency



California
Water
Environment
Association
7677 Oakport Street, Suite 525
Oakland, CA 94621-1935

March 4, 2004

Via E-mail and U.S. Mail

Honorable Arthur G. Baggett Jr., Chair, and Members
California State Water Resources Control Board
1001 "I" Street
Sacramento, California 94815

**Subject: Draft Revised Statewide Program Environmental Impact Report Covering
General Waste Discharge Requirements for Biosolids Land Application**

Dear Chairman Baggett and Members of the Board:

The California Water Environment Association (CWEA) is a nonprofit public benefit corporation with approximately 7,500 members who are professionals in the wastewater industry committed to keeping California's water clean. We are dedicated to the educational development of our members, most of whom (approximately 80 percent) work for municipal wastewater agencies, both large and small, throughout the state of California. Approximately 13 percent work for consulting engineering firms that work closely with agencies; approximately 3 percent work for equipment manufacturers serving the wastewater industry.

As California's leader in wastewater training and certification since 1927, CWEA trains and certifies thousands of wastewater professionals annually, disseminates technical information, and promotes sound policies to benefit society through protection and enhancement of our water environment. CWEA offers a complex set of 21 validated certifications of competency for wastewater personnel in six specialties, including a certification in Biosolids Land Application Management. CWEA's training and certification assists wastewater professionals in maintaining public safety, complying with regulation, reducing agency costs, and increasing efficiency.

CWEA would like to express our appreciation to the State Water Resources Control Board (SWRCB) for the development of the Draft Revised Statewide Program EIR Covering General Waste Discharge Requirements for Biosolids Land Application (PEIR). Biosolids should be recycled from California wastewater treatment plants to provide valuable nutrients and soil conditioners to our agricultural land. Based on this, we support the adoption by the SWRCB of a General Order for General Waste Discharge Requirements for Biosolids Land Application for beneficial use as a soil amendment.

The PEIR was certified in 2000. Subsequent litigation has led to additional analysis of two of the project alternatives. These alternatives are the Class A Only Alternative and the Food Crop Limitation Alternative. The January 2004 Revised Draft PEIR presents a detailed analysis of these two alternatives. The result of the additional analyses is that the Modified General Order remains the environmentally superior alternative. We support this conclusion and provide the Board with the following supplemental information, which illustrates the need for, and benefits of, adoption of a General Order for land application of biosolids.

The majority of wastewater treatment plants in California currently treat biosolids to Class B standards. Class B biosolids are produced at the wastewater treatment plant by treatment of raw sludge that is produced during the wastewater treatment process, and subsequent dewatering. The resultant product has detectable levels of pathogens that rapidly die off when land applied in accordance with the management techniques required under the United States Environmental Protection Agency Part 503 Rule (Part 503 Rule). It should be noted that the requirements set forth in the Modified General Order are significantly more stringent than those required under the Part 503 Rule.

A very limited number of wastewater treatment plants in California currently have the capability to produce a Class A product. Class A biosolids are produced by chemical stabilization, composting, heat drying, and anaerobic digestion at higher than conventional temperatures, among other processes. The resultant product is essentially free of pathogens prior to land application and thus the additional management parameters required for Class B biosolids are not required for Class A biosolids under the Part 503 Rule. Due to the pathogen reduction treatment process, Class A materials often have somewhat lower soil nutritive values than Class B materials. The requirements set forth in the Modified General Order for the management of Class A biosolids adds to the safety factor provided by the Part 503 Rule.

Essentially, the difference between the properties of Class B and Class A biosolids is the relative level of pathogens, which is equalized by management techniques, though at a loss of relative soil nutritive values. Additional differences lie with the impacts of production, available capacity, capital investment requirements, the relative costs of production, and facility siting issues.

While the overall impact of producing and land applying Class B biosolids is somewhat less than that associated with the production of Class A biosolids, CWEA considers both to be environmentally sound biosolids management techniques and as such supports the availability of both options to California's wastewater treatment agencies.

In conclusion, CWEA supports the continued beneficial use of biosolids in California. We urge the SWRCB recertify the PEIR and re-adoption of the Modified General Order for the land application of biosolids.

Regards,



Larry G. Tolby
CWEA President

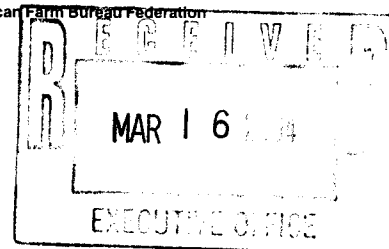
CC: Mr. Gary Carlton, SWRCB Board Member
Mr. Richard Katz, SWRCB Board Member
Mr. Peter Silva, SWRCB Board Member
Ms. Nancy Sutley, SWRCB Board Member
CWEA Board of Directors



Riverside County Farm Bureau, Inc.

21160 Box Springs Road, Suite 102, Moreno Valley, California 92557-8706
Telephone 909.684.6732 Fax 909.782.0621 E-mail President@RiversideCFB.com
www.RiversideCFB.com Affiliated with the California Farm Bureau Federation and American Farm Bureau Federation

March 11, 2004



Board of Directors

President
Cindy Domenigoni

Vice Presidents
Brad Scott
Bruce Scott
Sid Sybrandy

Past President
Andy Domenigoni

Lee Anderson, Jr.
Linden Anderson
Howard Cherniss
Stephen J. Corona
Ben Drake
Dan Hollingsworth
Richard Kelley
Larry Minor
Randy Record
Richard Schmid
Darl Young, Jr.
Greg Young
David Zeiders

Treasurer
Anton Schmidt

Staff

Executive Director
Corporate Secretary
Steven A. Pastor

Office Manager
Stephanie R. Bell

*Serving
Riverside
County
Agriculture
Since
1917.*

State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

RE: Adoption of Water Quality Order No. 2000-10-DWQ – General Waste Discharge Requirements (GWDRs) for Discharge of Biosolids to Land for Use as a Soil Amendment in Agriculture, Silviculture, Horticulture, and Land Reclamation Activities

Dear Members of the Board:

The Riverside County Farm Bureau is writing to express our support of the adoption of the State Water Resources Control Board Water Quality Order No. 2000-10-DWQ – General Waste Discharge Requirements for Discharge of Biosolids to Land for Use as a Soil Amendment in Agriculture, Silviculture, Horticulture, and Land Reclamation Activities.

We are educated about the benefits of Biosolids recycling and we firmly believe that fertilizing with Biosolids is an environmentally sound practice. People in the farming community believe that Biosolids recycling programs statewide have been well administered and properly monitored.

Biosolids have allowed some of our members to farm economically and efficiently. In the semi-arid region of Western Riverside County, Biosolids add valuable organic material to the soil, which helps to improve the soil's ability to feed the crops, limit erosion and retain moisture. Using Biosolids has led to higher yields and protein counts in area crops, which is a testimony to the value of this material over chemical fertilizers.

A wealth of scientific evidence and time-tested recycling continues to demonstrate the safety and environmental advantages of recycling Biosolids on agricultural lands. The production of Biosolids continues to provide a valuable resource for soil conditioning and crop fertilization and offers



State Water Resources Control Board
March 11, 2004
Page 2

farmers across the nation a low-cost effective alternative to commercial chemical fertilizer products.

We urge the Board to adoption of the State Water Resources Control Board Water Quality Order No. 2000-10-DWQ.

Thank you for your support.

Sincerely,
RIVERSIDE COUNTY FARM BUREAU, INC.

Cindy Domenigoni
President

cc: RCFB Board of Directors

Wayne Verrill, Management Practices Support Unit
Division of Water Quality
State Water Resources Control Board
P.O. Box 100
Sacramento, Ca 95812

Paul Dabbs Bulletin 160
Statewide Water Planning Branch
Department of Water Resources
P.O. Box 942836
Sacramento, CA 95814

Subject: Biosolids

Gentlemen:

Objection to biosolid application on lands has been led by the County of Kern. This agency has allowed raw sewage to be dumped into and adjacent to watercourses, but has shown concern over biosolids when it saw a method to extort funds from biosolid hawlers to pay developer fees for generous contributors. Neither the Board nor the Department need be involved in the County's petty corruption.

There are in California also those cultists who see biosolid application as an affront to Mother Earth. Biosolid use has been in place for a long time in states with a better record of scientific environmental concern than this State, which is oft emotional and quasi-religious. One must ask these cultists what they conceive the term "organic" to be.

There may be those who have concerns about accumulation of biosolids in their area and the effects of salts or heavy metals. Rational protocols need to be followed. Biosolid use is less a case of yes or no than of where and how.

In all of the arguments concerning biosolid use, both valid and invalid, the focus has been on water quality; the use can benefit water supply. Much of this State has been subjected to hydraulic mining and catastrophic fire, which causes sheet erosion and storage loss. Standardized judicious use of biosolids, when mixed with a binder and seeds, has been proven effective in highway construction and watershed restoration.

Considering the bleak future forecast for California's water supply, your two agencies need to do some preliminary coordination concerning biosolid application protocols and include them into the State Water Plan, Bulletin 160.

Sincerely,

Dennis Fox
918 Blossom St.
Bakersfield, CA 93306

R. EMIGH LIVESTOCK

P.O. Box 788 • Rio Vista, CA 94571 • (707) 374-5585

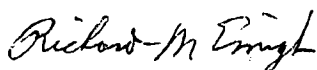
State Water Resources Control Board
1001 I Street
P O Box 100
Sacramento CA 95812-0100

February 27, 2004

Dear Board Members,

I am writing to support the permitting to apply regulated biosolids material to agricultural farmland. I see this as a win/win situation for our society across the nation. The options of storing biosolids on site at city treatment plants or transporting and storing them at landfills do not make economical or environmental sense for anyone. Land application of biosolids on farmland in rural areas promotes agriculture and increases crop production due to enhanced nutrition of the soil. I believe it is important to properly process all material through city sewer plants to ensure a quality product enters the field. I appreciate your attention to this valuable process for the community.

Sincerely,



Richard M. Emigh

I-3

Ian Anderson
6269 Birds Landing Road
Birds Landing, CA. 94512

February 23, 2004

State Water Resources Control Board
1001 I Street
Sacramento, CA. 95812

Dear Sirs:

I am a dryland grain, sheep and hay farmer in Solano County. I am well aware of the controversy of bio solids land applications. I also have been a user of class B biosolids over the past 10 years.

From an agricultural point there has been very positive results from biosolids on my farm. This has been a result primarily from a multi year release of the nitrogen and phosphorus to the grain crops and the following year pasture as sheep feed. Traditional fertilizer inputs which rely heavily on petro chemicals have doubled in price in the past three years with more price increases expected. These chemical fertilizers have worked fine but have a very short duration and they cost in the range of \$50.00 per acre to apply. This cost saving alone of \$50.00 is the difference of a profit or loss on my farm. This of course also is a major factor in my ability to continue farming and supplying domestic food product for Americans.

From an enviromental stand point I believe there needs to be high standards met for biosolids land application. I believe with monitoring and meeting the 501 regulations that the industry is meeting the needs for safe usage. I have no problem with fees which help all of us learn more about any possible long term effects for humans with its usage.

It appears to me that hysteria far exceeds sound science when it comes to this topic. I personally think that for the enviroment the huge dilution which occurs from the application solves most of my concerns for heavy metals, as for air born pathogens I think further study should be conducted. When I look at our land fills being inudated with materials that could be recycled I certainly see biosolids as a major component which should be recycled.

In conclusion, I believe the present laws are sufficient to allow the very beneficial agricultural use of biosolids and the State Water Resources Board should have policies which allow its usage.

Truly,


Ian Anderson



RESPONSIBLE BIOSOLIDS MANAGEMENT, INC.

March 11, 2004

State Water Resources Control Board
1001 "I" Street
Sacramento, CA 95814

Re: SUPPORT FOR EIR AND GENERAL ORDER FOR BIOSOLIDS USE

Honorable Chairman and Members of the Board:

Our company, Responsible Biosolids Management, INC., land applies biosolids to agricultural land in Kern County, California. We have been a service provider to farmers since 1994. We are writing to voice our support for the statewide General Order and Environmental Impact Report for biosolids reuse.

As a service provider, we have had many occasions to talk to farmers about the benefits they attribute to using biosolids as a soil amendment. These benefits include but are not limited to:

- Land application enriches the soil and provides most of the primary nutrients and micro-nutrients for plant growth.
- Land application conserves water, and in California, this is a notable benefit.
- Land application protects from erosion and improves soil tilth.
- Biosolids are a less expensive fertilizing product, used by farmers nationwide.
- Biosolids eliminate the need to use inorganic chemical fertilizers.

In addition to these important farming benefits, land application assists wastewater treatment plants in keeping costs down for ratepayers. If agencies were forced to change their policies and practices to discontinue land application, treatment costs could increase dramatically. This would place an unnecessary burden on smaller agencies that have no capital reserves.

When managed under the guidelines of 40 CFR 503, biosolids have proven to be safe. This is why over 60% of the Nations biosolids are beneficially reused through land application.

We strongly support biosolids reuse and we ask that you adopt the General Order and certify the Environmental Impact.

Very truly yours,

Jon Coffin, President
Responsible Biosolids Management, Inc.

Cc: Steve Stockton
Lucio Torres
John Mackall



A Residuals Management Company

March 1, 2004

State Water Resources Control Board
1001 "I" Street
Sacramento, CA 95814

Re: Support for EIR and General Order for Biosolids Use

Honorable Chairman and Members of the Board:

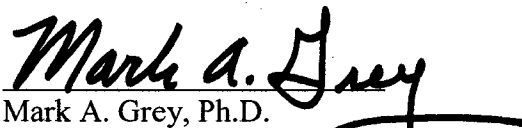
Synagro Technologies, Inc. and its affiliated entities provide services for reuse of biosolids in 37 U.S. states. Land application of Class B biosolids (land application) is a safe and effective use of biosolids for the generator and the crop grower.

Synagro provides management of the reuse of residuals from the wastewater process in many ways, including land application, composting, pelletization, landfilling as ADC, and incineration. Our documented, extensive, and controlled program history of land application of biosolids assures the people of Synagro that reuse through land application is environmentally safe and wise.

- Land application enriches the soil and provides necessary nutrients for plant growth. Marginal soil in California can be used to produce beneficial crops.
- Land application conserves water, a significant benefit to California.
- Land application reduces soil erosion, thus protecting a valuable resource.
- Biosolids are a less expensive fertilizing product that can improve California growers' ability to compete by reducing the need to use costly inorganic chemical fertilizers.
- Land application costs are significantly lower than fees for other management options thereby reducing the cost to the California ratepayers.

Thank you for your consideration. We ask that you adopt the General Order and certify the Environmental Impact Report and we appreciate your continued support of biosolids use.

Very truly yours,


Mark A. Grey, Ph.D.
Regional Director of Technical Services